

Exhibit 1

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IN THE SUPERIOR COURT OF CALIFORNIA

FOR THE COUNTY OF SAN BERNARDINO

RONNIE D. JORDAN, an)
individual,) CASE NO. CIVSB2201281
)
Plaintiff,)
)
vs.)
)
THE ORIGINAL MOWBRAY'S TREE)
SERVICE, INCORPORATED,)
et al.,)
)
Defendants.)

)

REMOTE VIDEOTAPED DEPOSITION OF

ROBIN MOWBRAY

May 30, 2023

9:02 a.m.

Kieu Pham, CSR NO. 13667

APPEARANCES OF COUNSEL		Page 2	DEPOSITION OF ROBIN MOWBRAY	
1			1	DEPOSITION OF ROBIN MOWBRAY
2			2	May 30, 2023
3	On Behalf of the Plaintiff:		3	
4	CATANZARITE LAW CORPORATION		4	
	Kenneth J. Catanzarite, Esq.		5	THE VIDEOGRAPHER: We are now on the video
5	2331 West Lincoln Avenue		6	record. This is the video deposition of Robin
	Anaheim, California 92801		7	Mowbray taken by the plaintiff in the matter of
6	(714) 520-5544		8	Ronnie D. Jordan versus The Original Mowbray's Tree
	Kcatanzarite@catanzarite.com		9	Service, Incorporated, et al. filed in the Superior
7			10	Court of California for the County of San
8	On Behalf of the Defendants:		11	Bernardino, case number CIVSB2201281 held via web
9	CKB VIENNA, LLP		12	videoconference on May 30, 2023, at 9:02 a.m.
10	Stephen Cho, Esq.		13	Pacific time.
	9531 Pittsburgh Avenue		14	I am Elizabeth Prado, the videographer. The
11	Rancho Cucamonga, CA 91730		15	court reporter is Kieu Pham. We are from the firm
	(909) 980-1040		16	AdvancedONE.
12	Scho@ckbvienna.com		17	Would counsel on the conference please
13	Also Present:		18	identify yourselves and state whom you represent
14	Elizabeth Prado, Videographer		19	beginning with the questioning attorney.
15	Ronnie Jordan		20	MR. CATANZARITE: Good morning, all. Ken
16			21	Catanzarite appearing for Ronnie Jordan, plaintiff.
17			22	MR. CHO: Good morning. Stephen Cho for
18			23	Robin Mowbray and the Mowbray defendant.
19			24	THE VIDEOGRAPHER: Thank you. The court
20			25	reporter will now swear in the witness.
21				
22				
23				
24				
25				
1	INDEX OF EXAMINATION	Page 3	Page 5	
2			1	THE REPORTER: If you raise your right hand,
3	WITNESS: ROBIN MOWBRAY		2	please. You do solemnly swear that the testimony
4			3	you are about to give in this deposition proceeding
5	EXAMINATION	PAGE	4	will be the truth, the whole truth, and nothing but
6	BY MR. CATANZARITE	5	5	the truth.
7			6	THE WITNESS: I do.
8			7	
9	INDEX TO EXHIBITS		8	EXAMINATION
10	PLAINTIFF'S	PAGE	9	BY MR. CATANZARITE:
11	2 Monthly Payment Summary	62	10	Q Good morning, Ms. Mowbray. How are you?
12	4 5/28/18 Letter re: Employment	42	11	A I'm good. How are you?
13	Contract Between Ronnie Jordan and		12	Q I'm great. Thank you for asking. Have you
14	The Original Mowbray's Tree Service,		13	ever had your deposition taken before?
15	Inc., Bates Plaintiff Jordan's PODs 48		14	A Yes.
16	6 Memo to All Mowbray's Employees,	86	15	Q On how many occasions?
17	Bates Plaintiff Jordan's PODs 45-47		16	A Oh, three.
18	7 4/24/20 E-mail re: Mowbrays - Ronnie	78	17	Q When was the last one?
19	Jordan Employment Agreement, Bates		18	A I'd say it probably was a few months ago.
20	TOMTS 3241-3243		19	Q Okay. And in that deposition, you were a
21	8 9/7/22 Pino Statement of Information	96	20	party or a -- simply a witness?
22	Corporation		21	A A party. I was a party.
23	9 4/20/23 Pino Statement of Information	96	22	Q All right. So I'm going to go over the
24	Corporation		23	admonitions about your testimony here today, and
25	H Balance Sheet as of December 31, 2018,	67	24	I'll be brief since you recently gave your
	Bates TOMTS 3224-3240		25	deposition.
I	I Employment Agreement	76		

Page 6	Page 8
1 Do you understand the oath is -- you took is 2 the same as you'll take at the time of trial?	1 Q Okay. I'd like to first understand what 2 your education is since high school. When did you 3 graduate from high school?
3 A Yes.	4 A In 1992.
4 Q You understand I'm entitled to your best 5 estimate today without guessing or speculating. Do 6 you understand that?	5 Q And did you have any further education 6 beyond high school?
7 A Yes.	7 A I went to nursing school but did not 8 complete it.
8 Q Do you understand the difference between a 9 guess and speculation and testimony that gives me 10 your best estimate of testimony?	9 Q Okay. And what years did you go to nursing 10 school?
11 A Yes.	11 A It had to be probably around 1993.
12 Q Okay. For purposes of your deposition here 13 today, have you reviewed any documents?	12 Q Okay.
14 A A few, yes.	13 A Or '92.
15 Q Okay. Do you recall what documents you 16 reviewed?	14 Q Did you pursue any other formal education 15 following your efforts at nursing school?
17 A I think it was just a declaration, some text 18 messages, yeah.	16 A No.
19 Q When you say declaration, what declaration 20 do you recall referring to?	17 Q Okay. Have you taken any courses or 18 training courses on accounting?
21 A I don't recall exactly what it is. Just 22 our -- I forgot what it's called. That we filed our 23 response to the lawsuit.	19 A No.
24 Q Okay. Fair enough. Did you review the 25 sworn statement of your brother, Rick Mowbray?	20 Q How about finance?
26 A Yes.	21 A No.
27 Q Okay. Did you review that in anticipation 28 of your testimony here today?	22 Q Have you had any training in the tree 23 service industry?
29 A Yes.	24 A No.
30 Q Other than discussions with your counsel, 31 did you discuss his sworn statement with anyone 32 else?	25 Q Do you hold any licenses as a contractor?
33 A No.	
34 Q Okay. You understand that when the 35 deposition concludes, you'll be given a copy of the 36 transcript and entitled to make corrections to it.	
37 A Yes.	
38 Q Okay. You understand, however, that should 39 you change your response substantively, that I may 40 comment upon it adversely at the time of trial.	
41 A Yes.	
42 Q In other words, I may take the position that 43 you're not telling the truth at the time of trial 44 and you were telling the truth in your deposition or 45 vice versa.	
46 A Do you understand?	
47 A Yes.	
48 Q Okay. Is there any reason you can't give me 49 your best testimony today?	
50 A No.	
Page 7	Page 9
1 A Yes.	1 A No.
2 Q Okay. Did you review that in anticipation 3 of your testimony here today?	2 Q Do you know whether or not Mowbray's -- and 3 we'll call The Original Mowbray's Tree Service, if 4 it's okay with you all, refer to that as MTS. Is 5 that okay?
4 A Yes.	6 A Sure. Yes.
5 Q Other than discussions with your counsel, 6 did you discuss his sworn statement with anyone 7 else?	7 Q And there's also another company called 8 Mowbray Waterman Property, LLC. If I refer to that 9 as MWP, is that okay with you?
8 A No.	10 A Yes.
9 Q Okay. You understand that when the 10 deposition concludes, you'll be given a copy of the 11 transcript and entitled to make corrections to it.	11 Q Okay. Very good. So -- so do you 12 understand that MTS has licenses?
12 A Yes.	13 A Yes.
13 Q Okay. You understand, however, that should 14 you change your response substantively, that I may 15 comment upon it adversely at the time of trial.	14 Q Okay. Do you know who the responsible 15 managing officer is for those licensed activities?
16 A Yes.	16 A Ricky Mowbray.
17 Q In other words, I may take the position that 18 you're not telling the truth at the time of trial 19 and you were telling the truth in your deposition or 20 vice versa.	17 Q Okay. How long -- and forgive me. Who is 18 Ricky Mowbray?
21 A Do you understand?	19 A He's the current CEO of MTS, and he's also 20 my nephew.
22 A Yes.	21 Q Okay. And when did Ricky Mowbray become the 22 responsible managing officer of Mowbray -- of MTS?
23 Q Okay. Is there any reason you can't give me 24 your best testimony today?	23 A For the contractor's license, I don't recall 24 the exact date, but a few years, I'm sure.
25 A No.	25 Q Okay. Do you know who the -- if I use the

Page 10		Page 12	
1	word -- the abbreviation RMO for reasonable managing	1	A Just Gloria Mowbray, my mom.
2	officer, will you understand that's what I'm	2	Q Okay. And when did Gloria pass?
3	referring to?	3	A April 1st, 2021.
4	A Yes.	4	Q Okay. And did Gloria -- may I refer to her
5	Q Okay. Who was the RMO of MTS before Ricky	5	as Gloria?
6	Mowbray?	6	A Yes.
7	A It was Rhonda Ramirez.	7	Q May I refer to Richard Mowbray as Rick?
8	Q Is Roger [sic] Ramirez still employed by	8	A Yes.
9	MTS?	9	Q And may I refer to Rhonda Ramirez as Rhonda?
10	A I'm sorry. The name was Rhonda Ramirez.	10	A Yes.
11	Q Okay. Is she related to you?	11	Q Thank you. Did Gloria Mowbray transfer any
12	A Yes. She's my sister.	12	of her stock before her death?
13	Q Okay. So she was the RMO before Ricky;	13	A Yes. She -- no. Actually, no. Not her
14	correct?	14	stock, no.
15	A Yes, uh-huh.	15	Q Not her stock?
16	Q And is she employed by MTS today?	16	A No.
17	A Yes.	17	Q So -- and I'm referring to the common stock
18	Q Okay. Is her husband, Mr. Ramirez, employed	18	of -- of MTS.
19	by MTS today?	19	A Yes.
20	A Yes.	20	Q Your testimony is she did not transfer any
21	Q All right. And Ricky's employed by MTS	21	shares to anyone before she died on April 1st, 2021;
22	today; correct?	22	is that correct?
23	A Yes.	23	A Correct.
24	Q Okay. So prior to Rhonda becoming RMO, who	24	Q Have you ever reported to anybody that you
25	was RMO before Rhonda?	25	were a shareholder of MTS prior to your mother's
Page 11		Page 13	
1	A Nobody. She was the original one.	1	1 passing?
2	Q Okay. And what is your date of birth?	2	A No.
3	A January 6, 1974.	3	Q Okay. And when she passed, how did her
4	Q And if I understand my research team, you're	4	shares transfer?
5	the youngest of the Mowbray children of Gloria	5	A 100 percent to me.
6	Mowbray?	6	Q To you individually or you in trust? Any
7	A Yes.	7	type of restrictions on your transfer?
8	Q And who -- who -- give me, if you can, the	8	A I believe it is a trust. Yeah, it's in her
9	names of the children of Gloria and their	9	trust.
10	approximate ages today.	10	Q Okay. So in other words, your belief is
11	A Richard Mowbray -- Rick Mowbray, he's --	11	that at Gloria Mowbray's death, her interest in MTS
12	God, he's -- sorry. He's ten years older than me.	12	passed into a trust over which you are the trustee?
13	He's 59.	13	A Yes.
14	Q Okay.	14	Q Did she have something called a revocable
15	A And then it's Rhonda Ramirez. She's 56.	15	trust?
16	I'm sorry. I'm bad about their exact ages. And	16	A I'm not sure.
17	then my brother, Randall Mowbray, he's about 52, 53.	17	Q Okay. Were the shares held in trust by you
18	And then it's me, and I'm 49.	18	as trustee at the time of her passing?
19	Q Thank you for that. Okay. Now, with	19	A After -- yes, after passing, yes.
20	respect to Mowbray's Tree Service, I note that the	20	Q Okay. And -- and are you the sole trustee
21	company was incorporated years earlier. Do you	21	of the Gloria Mowbray trust?
22	recall the year Mowbray's or MTS was incorporated?	22	A Yes.
23	A I believe it was in 2002.	23	Q Okay. And who are the beneficiaries of the
24	Q Okay. And who were the shareholders of	24	Gloria Mowbray trust?
25	Mowbray's at the time it was incorporated?	25	A I believe just me.

Robin Mowbray, 05/30/2023

<p style="text-align: right;">Page 14</p> <p>1 Q Okay. The corporation Mowbray -- MTS, is it 2 a subchapter S corporation? 3 A Yes. 4 Q Do you understand what that means? 5 A Yes. 6 Q What does it mean? 7 A The single 100 percent owner of the 8 corporation. 9 Q 100 percent what? 10 A Sole owner of a corporation. 11 Q Okay. 12 A Single -- yeah. 13 Q So you're the sole owner of the corporation 14 at this point, and Gloria was the sole owner before; 15 correct? 16 A Yes. 17 Q And do I understand that Gloria was the 18 owner so that she -- she received some benefit as a 19 minority -- women's minority enterprise owner? 20 A I think there was more than just that reason 21 why she was the owner. Her and my dad started this 22 company, so -- 23 Q I understand your father was -- was injured 24 in a very serious accident and has not been active 25 for years; is that correct?</p>	<p style="text-align: right;">Page 16</p> <p>1 Ronnie was hired. I think he was made the president 2 CEO, and she was just the owner. 3 Q Okay. Fair enough. So there's at least one 4 change you've told me about when Ronnie Jordan was 5 hired. Ronnie became the president and, I believe, 6 chief executive officer; is that correct? 7 A Yes. 8 Q Okay. Now, when Ronnie is hired, do you 9 recall when that is? 10 A Oh, so sorry. I don't know the exact date. 11 I think it was around 2018. 12 Q Around 2018? 13 A Yes. 14 Q Okay. Do you know why he was hired? 15 A I think that he -- well, he was known in 16 this industry, and so my brother, Rick, was -- was 17 talking to about hiring him with my mother and just 18 that -- you know, he was very well-known in the 19 industry, so decided to hire him. 20 Q Okay. So I'd like to go back. Tell me when 21 this hiring is occurring, what is your knowledge of 22 the hiring? And by hiring, I mean of Ronnie Jordan 23 who we'll refer to as Ronnie. 24 A Just that my -- like I said, my brother, 25 Rick, worked with him and knew him prior. I believe</p>
<p style="text-align: right;">Page 15</p> <p>1 A Yes. 2 Q When -- when did the accident occur? 3 A In 1993. 4 Q And I understand he did not recover from 5 that accident. He's disabled today? 6 A Yes. 7 Q Okay. So prior to her death on April 1st, 8 2021, what officer status, if any, did Gloria 9 Mowbray have in MTS? 10 A The owner, I believe. The president. 11 Q Okay. Was she a director of the company? 12 A Yes. 13 Q How many other directors were there, if any? 14 A I don't remember at that time. There 15 might -- I recall maybe three. 16 Q Okay. When you say at that time, you mean 17 at the time of her death? 18 A No. Before. Before. 19 Q All right. So the company's incorporated in 20 2002. Your mother is the sole shareholder of the 21 common stock of the company. 22 And you understand from that point on, that 23 is from 2002, she was the president of the company; 24 is that correct? 25 A I think -- yeah, but that was changed when</p>	<p style="text-align: right;">Page 17</p> <p>1 my mom knew of him, too. And so -- yeah, so they 2 decided to hire him to be the CEO and help us. 3 Q All right. So your brother, Rick, knew of 4 him. Are you familiar with something called the 5 bark beetle project? 6 A Yes. 7 Q And MTS -- were you aware of Ronnie Jordan 8 at the time of the bark beetle project? 9 A I think I heard about him after that. 10 Q Okay. Did MTS work for the company that 11 Ronnie Jordan was then at for the bark beetle 12 project? 13 A You know, I'm not sure. I know Rick's 14 company did, but I don't know if we -- yeah, I 15 believe we did. I believe we did. 16 Q Okay. So -- and you said Rick's company. 17 What company was Rick's company? 18 A His company was Mowbray's Tree Company. 19 Q Okay. And how long did that company 20 operate? 21 A I believe until he went to prison. I think 22 it was around 2008, 2007. I'm sorry. I don't 23 recall the exact time. 24 Q That's okay. Do you recall when he got out 25 of prison?</p>

<p>1 A I believe it was around 2011.</p> <p>2 Q Okay. Did you visit him in prison?</p> <p>3 A No.</p> <p>4 Q Was he married at the time he was incarcerated?</p> <p>5 A Yes.</p> <p>7 Q Who was he married to?</p> <p>8 A Denise Mowbray.</p> <p>9 Q Okay. Was Denise also working at Mowbray's Tree Company?</p> <p>11 A Yes.</p> <p>12 Q Did she -- was she also incarcerated?</p> <p>13 A Yes.</p> <p>14 Q Did they both go in about the same time, 2007 or 8?</p> <p>16 A I believe she went in after him, but I don't know -- I -- I think maybe it was, like, months after he went.</p> <p>19 Q Okay. And through -- do you know when Denise got out of prison?</p> <p>21 A She was there, I think, three and a half, so -- oh, gosh. I want to say -- gosh, I'm so sorry. I'd say maybe around 2010.</p> <p>24 Q Okay. After Rick got out of prison, did he go to work for Mowbray's?</p>	Page 18	<p>1 involve, as you termed it, guys in the field?</p> <p>2 A It probably was more aspects to that.</p> <p>3 Contracts -- getting contracts. You know, I think it entailed maybe part of it, yes.</p> <p>5 Q Yeah. In other words, what I mean to say is the guys in the field are cutting down and trimming trees which generates revenue that the company receives; correct?</p> <p>9 A Yes.</p> <p>10 Q The people who are in the main office of the company, their administrative function is to support the guys in the field. That is to schedule, pay them, get insurance, enter contracts, and bill and receive money and administer the operations of the company; correct?</p> <p>16 A Yes.</p> <p>17 Q Okay. So -- so Rick is out in the field. Is he in -- is he the guy who's -- who's operations manager during that entire time period, 2013 to 2020?</p> <p>21 A I'd say we'd have other people, too. We'd have, you know, Ignacio Huerta was one, Marcos Rodriguez. So I'd say there was other ones, also. Excuse me.</p> <p>25 Q Uh-huh. Okay. Who reported to Rick, then?</p>	Page 20
<p>1 A No right away, no.</p> <p>2 Q Okay. Do you know when he first went to work for Mowbray's? Sorry. Bad question. Do you know when Rick first went to work for Mowbray's after he got out of prison?</p> <p>6 A Oh, gosh. So he was in there for five years. Let me see. 2000 -- I would say maybe 2013.</p> <p>8 Q Okay. And was he continuously employed at Mowbray's Tree Service from 2013 until discharge sometime in January 2020?</p> <p>11 A I believe so, yes.</p> <p>12 Q Okay. What was his position and function -- that is Rick's position and function starting in 2013?</p> <p>15 A I believe he was the operation manager. That was his title.</p> <p>17 Q What did that entail, if you know?</p> <p>18 A I think he would just organize maybe, like, work.</p> <p>20 Q And --</p> <p>21 A I want to say that. Yeah, I -- yeah, he -- yeah, I don't know. He was more involved with the guys in the field, I'd say.</p> <p>24 Q All right. Is it fair to say that most of what Mowbray's did to generate its money would</p>	Page 19	<p>1 A I guess you could say Ignacio, maybe. I don't -- I don't really know if he would report to him. I guess they were kind of even because they're all kind of, like, area managers. So I guess I would say the guys in the field.</p> <p>6 Q Well, you -- you began by saying that Ignacio reported to Rick. Isn't it fair to say that the guys in the field, including those who are also operating groups of people in the field, reported to Rick?</p> <p>11 A Yes. Yeah.</p> <p>12 Q Okay. Now, you say that you believed that Rick spoke with Gloria about the availability of Ronnie; is that correct?</p> <p>15 A Yes.</p> <p>16 Q I understand you're a very close family and that you take care of your mother and father -- or took care of your father with your mother; is that correct?</p> <p>20 A Yes.</p> <p>21 Q Okay. And that you lived close to one another, is that correct, physically?</p> <p>23 A Yes.</p> <p>24 Q All right. So the family gets together. Did Rick get together with Gloria in your presence</p>	Page 21

<p style="text-align: right;">Page 22</p> <p>1 and discuss the availability of hiring Ronnie?</p> <p>2 A I believe -- yes.</p> <p>3 Q Okay. What did he say about why he wanted</p> <p>4 to hire Ronnie?</p> <p>5 A Just that he's very knowledgeable, he knows</p> <p>6 a lot, and he's been around this industry for a</p> <p>7 while and that -- yeah.</p> <p>8 Q Tell me your role at the company at the time</p> <p>9 these conversations are ongoing. Do you have any</p> <p>10 responsibility for general ledger input, for</p> <p>11 example?</p> <p>12 A Um, yeah, I'm sure I had some.</p> <p>13 Q When you say you had some, what general</p> <p>14 ledger accounts did you have responsibility for?</p> <p>15 A You mean, like, my duties? I think one of</p> <p>16 the major ones were, like, payroll. I was a</p> <p>17 corporate secretary.</p> <p>18 Q Were you a director of the company?</p> <p>19 A No.</p> <p>20 Q So you were a corporate secretary, a formal</p> <p>21 title; correct?</p> <p>22 A Yes.</p> <p>23 Q And your mom was president, a formal title;</p> <p>24 correct?</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 24</p> <p>1 to the check through a payroll service?</p> <p>2 A On payroll, yes.</p> <p>3 Q Okay. So on payroll, your mother's</p> <p>4 signature would be affixed through the -- some</p> <p>5 application in the software system; is that correct?</p> <p>6 A I believe so, yes.</p> <p>7 Q But she would manually sign various other</p> <p>8 checks?</p> <p>9 A Yes.</p> <p>10 Q Who else had signature authority over the</p> <p>11 bank accounts in May of 2018?</p> <p>12 A I believe I might have. I think I was one.</p> <p>13 Q Okay. Did you ever sign any checks in May</p> <p>14 of 2018?</p> <p>15 A I don't think so, no.</p> <p>16 Q Okay. So where -- did you have an</p> <p>17 understanding as -- as these first discussions</p> <p>18 occurred with Rick and Gloria that you understood</p> <p>19 were occurring, did you have an understanding where</p> <p>20 Ronnie was living?</p> <p>21 A I believe he was working for another company</p> <p>22 in Northern California, I believe.</p> <p>23 Q Which company was that?</p> <p>24 A MLU.</p> <p>25 Q I'm sorry?</p>
<p style="text-align: right;">Page 23</p> <p>1 Q Who were the other officers, if any, at the</p> <p>2 time this discussion about hiring Ronnie occurs?</p> <p>3 A I think just my mom was the president, and I</p> <p>4 was the corporate secretary.</p> <p>5 Q Okay.</p> <p>6 A I believe that's all that -- yeah, around</p> <p>7 that time.</p> <p>8 Q Okay. So to your knowledge, there was no</p> <p>9 vice presidents --</p> <p>10 A No.</p> <p>11 Q -- is that correct?</p> <p>12 A No.</p> <p>13 Q Was there a treasurer?</p> <p>14 A It could have been my mom, but I'm not -- I</p> <p>15 don't recall.</p> <p>16 Q Who signed the checks in May of 2018?</p> <p>17 A My mom.</p> <p>18 Q She signed all the checks?</p> <p>19 A Yes.</p> <p>20 Q In other words, payroll for, let's say,</p> <p>21 hundreds of people, she would always sign all</p> <p>22 checks?</p> <p>23 A Yes, her signature was on them, yes.</p> <p>24 Q Well, I know signature could be on them, but</p> <p>25 was the signature a -- a -- a image that was affixed</p>	<p style="text-align: right;">Page 25</p> <p>1 A MLU.</p> <p>2 Q MLU?</p> <p>3 A Uh-huh.</p> <p>4 Q Where was he living while he was working for</p> <p>5 MLU?</p> <p>6 A I believe it was Northern California.</p> <p>7 Q Did you ever hear any reference to Ronnie</p> <p>8 living in Florida in May of 2018?</p> <p>9 A I believe he was, um, going to, I think,</p> <p>10 move there.</p> <p>11 Q When you say Northern California, what city</p> <p>12 in Northern California did you have an understanding</p> <p>13 he was living in?</p> <p>14 A You know, I don't -- I don't know the exact</p> <p>15 city. Sorry.</p> <p>16 Q Was it Sacramento?</p> <p>17 A No, I don't believe it was Sacramento.</p> <p>18 Q San Francisco?</p> <p>19 A No.</p> <p>20 Q Okay.</p> <p>21 A I don't know if it was Roseville, Rocklin.</p> <p>22 I'm so sorry. I don't remember.</p> <p>23 Q That's okay. Roseville. So that's -- is</p> <p>24 that -- what county is that? Do you recall the</p> <p>25 county?</p>

Page 26	Page 28
1 A Oh, no.	1 industry?
2 Q Okay.	2 A Like I said, I didn't know very much. Just
3 A I just remember they lived in an apartment,	3 that he's been around in the industry. He had, I
4 I want to say.	4 think, a family business, I think, in --
5 Q Okay. Had you ever met Ronnie prior to May	5 (unintelligible)
6 of 2018?	6 THE REPORTER: I'm sorry. Repeat that last
7 A No.	7 part.
8 Q Had you ever spoken with him on the phone	8 THE WITNESS: I think it's called Disaster
9 prior to May of 2018?	9 Recovery. He was part of -- he was part of bark
10 A No.	10 beetle.
11 Q Did you ever speak with him in the presence	11 BY MR. CATANZARITE:
12 of your mother while she was on the phone with	12 Q Do you recall meeting Ronnie when he came to
13 Ronnie prior to May of 2018?	13 work at Mowbray's after being hired by Rick?
14 A No.	14 A Yes.
15 Q Did you ever speak with her where you were	15 Q And how did that first encounter go, so to
16 in the presence of your brother, Rick, when he spoke	16 speak?
17 with Ronnie prior to May of 2018?	17 A You know, I don't remember the first
18 A No.	18 encounter. Yeah, I can't -- I don't recall exactly.
19 Q Okay. Now, at some point, did you learn	19 Q Did -- did Ronnie -- did Ronnie join
20 that your brother had hired Ronnie?	20 Mowbray's with his wife, Phyllis?
21 A Yes.	21 A Yes.
22 Q When did you learn that he had hired Ronnie?	22 Q Did you meet her, as well?
23 A Probably sometime around 2018 when he was	23 A Yes.
24 hired.	24 Q Okay. Now, I want to take you back to that
25 Q If I give you a date of, say, May of 2018,	25 timing. So let's say early 2018 before this -- the
Page 27	Page 29
1 does that sound familiar to you?	1 discussion of Ronnie is occurring, do you have an
2 A It might have. I don't remember the exact	2 understanding what the financial condition was of
3 date. I'm sorry.	3 Mowbray's at that time? I'm sorry. I said
4 Q Okay. Was your -- was your brother, Rick,	4 Mowbray's. Let me rephrase the question.
5 excited about the hiring of Ronnie?	5 Do you have an understanding of what the
6 A Um, yeah.	6 financial condition of MTS was in April of 2018?
7 Q Was your mother, Gloria, excited about the	7 A I don't recall exactly, you know, how much,
8 hiring of Ronnie?	8 you know, we had, but yeah. I don't recall.
9 A Um, I think she was, yeah, good with it.	9 Q Prior to April of 2018, did you routinely
10 Q Were you excited about the hiring of Ronnie?	10 receive financial statements from anyone concerning
11 A Yeah --	11 MTS's activity?
12 Q Why?	12 A I would never really receive them. Our
13 A -- I would say. Just that, you know, he had	13 accountant would take care of all that.
14 a lot of -- like I said, he's been around the	14 Q Okay. So I want to be clear. Between 2002
15 business for a while. Um, yeah, he was just known	15 and 2018, you don't have a recollection of looking
16 in the industry.	16 at financial statements from -- for MTS?
17 Q All right. And I don't want to put words in	17 A I might have looked at them, but I don't
18 your mouth, but when you say he's known in the	18 remember -- I can't recall what they were.
19 industry, did he have a good reputation in the	19 Q And do you know what financial statements
20 industry?	20 are?
21 A I believe so, yes.	21 A Yes.
22 Q Okay. All right. What what's your	22 Q Okay. What are they?
23 understanding in May of 2018 as this excitement with	23 A They're just, like, to show your profit,
24 respect to his hiring by Rick is occurring? What is	24 your loss, or how much money you have.
25 your understanding of Ronnie's reputation in the	25 Q Uh-huh. Okay. So are you familiar with

<p>1 something called an income statement which would 2 show the revenues and expenses for the period? 3 A Yes. 4 Q Okay. Are you familiar with something 5 called a balance sheet which would show your assets 6 and your liabilities and your equity during -- 7 A Yes, I've seen those, yes. 8 Q You've seen those. 9 A Yes. 10 Q Okay. So when I ask what you recall about 11 the financial condition of Mowbray's in 2018, do you 12 know what the profit and loss was year-to-date April 13 of 2018? 14 A You know, I'm so sorry. I couldn't recall 15 offhand what it was. 16 Q Okay. Do you know what the balance sheet 17 condition was as of 12/31/2017? 18 A No, I don't. I don't recall what that was. 19 Q Okay. And at that -- and at that point in 20 2018, your mom is the sole shareholder, if I 21 understand your testimony, of MTS? 22 A Yes. 23 Q Okay. All right. Did anyone say in any 24 fashion that MTS was having financial difficulty in 25 the first quarter of 2018?</p>	Page 30	<p>1 Is that the gentleman? 2 A Yeah, he would, and then we had our CPA. 3 Q Okay. Who were the CPAs at that time? 4 A It was Soren McAdam. Soren McAdam, yeah. 5 Q Okay. And what city are they in? 6 A I believe it's Redlands. 7 Q Okay. So Alan Phaing would handle the 8 internal function which would include preparation of 9 profit and loss statements and balance sheets and 10 other accounting functions and work with the 11 accounting firm -- the CPAs in Redlands in 12 generating final financial statements; is that 13 correct? 14 A Yes. 15 Q Okay. Now, with -- with respect to Alan's 16 role, did Alan say to you or anyone in your presence 17 that in 2017 what's your break-even analysis 18 required in terms of collections? 19 A You know, I'm so sorry. I don't recall. I 20 don't -- yeah. 21 Q Okay. Did -- did Alan or did anyone -- did 22 anyone relate to you -- whether or not it was Alan, 23 did anyone relate to you what the break-even 24 requirements were for collections into the company 25 to pay its bills in 2017 on a monthly basis?</p>	Page 32
<p>1 A I don't recall. I don't -- I don't believe 2 so. 3 Q Do you recall if anyone reported to you or 4 to your mother or to Rick or to others in your 5 presence what the financial condition was of MTS in 6 May of 2018? 7 A Yeah, I don't recall. 8 Q When you say you don't recall, does that 9 mean someone may have said something, you recall 10 something being said, but you just can't place it or 11 provide any specifics? 12 A Yeah, I might have -- yeah, I just don't -- 13 Q Fair enough. Fair enough. With respect to 14 that, is there a gentleman named Alan Phaing? Does 15 he work for MTS? 16 A Yes. 17 Q What is -- in April of 2018, what was 18 Mr. Phaing's duties and responsibilities? 19 A He was our controller, our accountant. He 20 took care of all our financials and -- 21 Q Okay. And was Alan at the tip of that 22 pyramid of the accounting function? In other words, 23 he was the guy who would have assembled a collective 24 data from accounts receivable, accounts payable, and 25 payroll and come up with the financial statements?</p>	Page 31	<p>1 A You know, I'm so sorry. I didn't take care 2 of all that, so I -- 3 Q Okay. Fair enough. You can only tell me 4 what you know. 5 A I know. Sorry. 6 Q That's okay. Well, we have -- we have a 7 deposition of -- of Ricky who I gather will go 8 through a number of these things, but I want to get 9 your background and your knowledge; okay? 10 A Okay. 11 Q Now, with respect to early 2018, did anyone 12 say to you in your presence -- or did you overhear 13 discussions about what the break-even analysis was 14 of MTS in 2018? 15 A You know, I don't remember. I don't recall. 16 Q Do you have any recollection that in 2018 at 17 the time that Rick hires Ronnie Jordan that the 18 break-even analysis reported by Alan Phaing was \$6 19 million per month? 20 A I would agree with that if that's what was 21 testified, yes. 22 Q Okay. Well, I'm not -- I'm not putting 23 words in your mouth. I want to understand what -- 24 you heard that number because I don't want you to 25 simply adopt what I question you on because, you</p>	Page 33

<p>1 know, if it's not accurate -- you either heard it or 2 you didn't hear it.</p> <p>3 A I know. Okay. You know, I'm so sorry.</p> <p>4 Yeah, I don't recall what -- I didn't know what -- 5 no, I don't -- I don't recall.</p> <p>6 Q Okay. So -- so what I'm coming to now is 7 was the purpose of -- of Rick and Gloria deciding to 8 hire Ronnie Jordan to help the company grow so that 9 it could cover its operating expenses?</p> <p>10 A That was one of them, yes.</p> <p>11 Q Okay. What were the others -- other 12 reasons?</p> <p>13 A Well, we did have a CEO that was Mike Neal. 14 I think that he lived in Arizona, and he would -- 15 she wasn't living in California, so there was an 16 issue there. So I believe we were having some 17 issues when he was the then-CEO at that time.</p> <p>18 Q I see. So Mike Neal. And did you -- had 19 you ever, shall we say, gotten together with Mike 20 Neal? Did you -- did you know who he was and talked 21 with him --</p> <p>22 A Yes.</p> <p>23 Q -- at the time?</p> <p>24 A Yes.</p> <p>25 Q Okay. Who was getting the business? In</p>	<p>Page 34</p> <p>1 Q So -- so you could appreciate -- everyone 2 can appreciate that if people are trimming or 3 cutting trees, that how fast you do that in a safe 4 manner --</p> <p>5 A Yes.</p> <p>6 Q -- will affect your profitability and your 7 revenue; correct?</p> <p>8 A Definitely, yes.</p> <p>9 Q Okay. So who was -- who was -- is it fair 10 to say that up to the time Ronnie's brought on 11 board, that Rick, your brother, is responsible for 12 making certain that the trees -- that the tree 13 process of cutting and cleanup and everything else 14 with utilities is handled properly?</p> <p>15 A No, I wouldn't say he was the only one in 16 charge. There was other ones. But I wouldn't say 17 he was the only one specifically in charge of that, 18 no.</p> <p>19 Q Okay. And the other two gentlemen you told 20 me about was Ignacio and Marcos; correct?</p> <p>21 A Yeah. I think there was also Jesus 22 Velasquez in Sacramento.</p> <p>23 Q Okay. Any others any others?</p> <p>24 A Not that I can recall offhand, but those 25 were the main ones.</p>
<p>1 other words, like any business, someone's gotta 2 bring in the business; right? And your business is 3 selling your tree service functions to utilities; 4 correct?</p> <p>5 A Right.</p> <p>6 Q Okay.</p> <p>7 A We always had our contract for Edison. We 8 received that in -- yeah, we had that prior years. 9 Still have it. I believe we were doing work for 10 PG&E, but I don't think we had a direct contract 11 with them.</p> <p>12 So I just think our main -- our main 13 contract at that time -- oh, I think we had some 14 Sacramento SMUD. So we already had those contracts 15 in place.</p> <p>16 Q Okay. How familiar are you with the process 17 of generating revenue by MTS's workers in the field?</p> <p>18 In other words, how did they generate revenue? Are 19 you familiar with the billing and how it -- sort of 20 how it comes together?</p> <p>21 A I mean, they trim trees. It could be a unit 22 lump sum, and then we invoice it, but I really 23 wasn't involved in the invoicing.</p> <p>24 Q Okay.</p> <p>25 A But yeah.</p>	<p>Page 35</p> <p>1 Q Okay. And Ignacio, can I have the spelling 2 of Ignacio's last name, please?</p> <p>3 A It's Huerta, H-U-E-R-T-A.</p> <p>4 Q And how about Marcos's last name, please?</p> <p>5 Spell it.</p> <p>6 A Rodriguez, R-O-D-I-G-U-E-Z [sic].</p> <p>7 Q Thank you. Okay. Now, with respect to 8 Ronnie's hire by Rick, are you familiar with the 9 compensation package?</p> <p>10 A His?</p> <p>11 Q Ronnie's.</p> <p>12 A I wasn't aware of it until later on.</p> <p>13 Q Okay. Okay. You say I wasn't aware of it 14 until later on. How much later?</p> <p>15 A I don't recall exactly what it was, but it 16 was probably when I was given the contract to have 17 my mom sign.</p> <p>18 Q Okay. Contract to have your mom sign. When 19 was your mom given a contract to sign? Do you 20 recall?</p> <p>21 A I know they had brought it to me a few times 22 to have her sign it, and I let -- I just let them 23 know that her attorneys would have to look that 24 over.</p> <p>25 Q Okay. Her attorneys would have to look that</p>

<p style="text-align: right;">Page 38</p> <p>1 over?</p> <p>2 A Yes.</p> <p>3 Q Which attorneys were those?</p> <p>4 A Stephen Cho and Michael Kim.</p> <p>5 Q Okay. All right. So you're familiar with</p> <p>6 the contract that is being -- it's a typed up</p> <p>7 contract; right?</p> <p>8 A Yes.</p> <p>9 Q Given to your mother that you brought to</p> <p>10 your mother to sign, prepare --</p> <p>11 A They brought it to me a few times and asked</p> <p>12 for me to have her sign, and, like, I would let them</p> <p>13 know that it would have to be looked over by her</p> <p>14 attorneys.</p> <p>15 QOkay. All right. And the -- and her</p> <p>16 attorneys meaning your -- Gloria's attorneys were</p> <p>17 Stephen Cho, who happens to be with us today, and</p> <p>18 Michael Kim; correct?</p> <p>19 A Yes.</p> <p>20 Q All right. They were also the company MTS's</p> <p>21 attorneys or at least some of the main attorneys;</p> <p>22 correct?</p> <p>23 A Yes.</p> <p>24 QOkay. Now, do you -- can you place the year</p> <p>25 that that contract is presented to your mother to</p>	<p style="text-align: right;">Page 40</p> <p>1 your mother to sign it?</p> <p>2 A Yes.</p> <p>3 QOkay. So someone's bringing -- let me see</p> <p>4 if I can -- let me see if I can -- are you able --</p> <p>5 where are you talking to me from? Are you from home</p> <p>6 or --</p> <p>7 A You know, I'm so sorry. I'm from home</p> <p>8 because I've been sick this weekend, so I'm just on</p> <p>9 this laptop. I'm so sorry.</p> <p>10 QOh, well, you have -- so you need me to show</p> <p>11 you a document before you can tell me about it or</p> <p>12 can I send it to you and --</p> <p>13 ASure, yeah. You can send it to my e-mail.</p> <p>14 QOkay. Well, let me do that. I'll send it</p> <p>15 to you, and I'll send it to Mr. Cho at the same</p> <p>16 time.</p> <p>17 MR. CATANZARITE: Stephen, is that okay with</p> <p>18 you rather than sending it through chat?</p> <p>19 MR. CHO: That's fine. Any way you can</p> <p>20 share it on the -- on the board or --</p> <p>21 MR. CATANZARITE: I can share it on the</p> <p>22 screen. Let me try share screen. You know,</p> <p>23 sometimes it's harder and the witness says well, I'd</p> <p>24 like to see more of the document. Let me -- let me</p> <p>25 show you a document and see if this is the document</p>
<p style="text-align: right;">Page 39</p> <p>1 sign?</p> <p>2 A You know, I don't remember the exact time.</p> <p>3 I believe we were in the building that we were in</p> <p>4 before we moved to this one. I really can't recall</p> <p>5 the exact year.</p> <p>6 Q Can you give me a range or estimate?</p> <p>7 A I don't know if it was 2019.</p> <p>8 Q Okay.</p> <p>9 A I think it might have been -- I don't know</p> <p>10 if it was before COVID. I don't remember. Sorry.</p> <p>11 Q Okay. If I -- if I tell you that the</p> <p>12 contract -- that contract isn't signed until late</p> <p>13 2020, does that refresh your recollection?</p> <p>14 A I don't believe it was that one that was</p> <p>15 signed.</p> <p>16 Q Okay. Now, prior to that contract that you</p> <p>17 saw that you know is signed, what was the contract</p> <p>18 arrangement for compensation of Ronnie that was</p> <p>19 agreed to by Rick and Gloria?</p> <p>20 A You know, I really don't remember exactly</p> <p>21 what was on -- I don't remember the -- all of it.</p> <p>22 Like I said, it was a one page, and it -- they --</p> <p>23 like I said, they kept on asking me to have my mom</p> <p>24 -- my mother sign it.</p> <p>25 Q Okay. It was one page, and they kept asking</p>	<p style="text-align: right;">Page 41</p> <p>1 you're referring to.</p> <p>2 BY MR. CATANZARITE:</p> <p>3 Q Can you see that document?</p> <p>4 A Yes.</p> <p>5 Q Okay. Is that the document that you were</p> <p>6 describing as a one-page document that your mother</p> <p>7 was being asked to sign?</p> <p>8 A Yes.</p> <p>9 Q All right. Who was asking your mother to</p> <p>10 sign that document?</p> <p>11 A I -- I believe that maybe Ronnie gave it to</p> <p>12 me, maybe Phyllis, and also their son-in-law,</p> <p>13 Josh -- oh, my goodness. I forgot his last name.</p> <p>14 Gosh. I'm so sorry. I forgot his last name.</p> <p>15 Q That's okay. So his son-in-law, Josh; is</p> <p>16 that correct?</p> <p>17 A Yes.</p> <p>18 Q Okay. And Josh was working for the -- for</p> <p>19 MTS, also; correct?</p> <p>20 A Yes.</p> <p>21 Q He was safety -- in charge of safety?</p> <p>22 A Yes.</p> <p>23 Q Okay. So these -- or one or more of these</p> <p>24 folks were asking -- were tendering this document to</p> <p>25 you to ask you to have Gloria sign it; correct?</p>

<p>1 A Yes.</p> <p>2 Q All right. Did you read it when you</p> <p>3 received it?</p> <p>4 A I don't believe I really did look at it. To</p> <p>5 be honest, I really didn't.</p> <p>6 Q Okay. Can you tell me did Rick give this</p> <p>7 document to you, as well?</p> <p>8 A No, never.</p> <p>9 Q I'm going to mark this as Exhibit 4.</p> <p>10 (Whereupon Exhibit 4 was marked for</p> <p>11 identification.)</p> <p>12 MR. CATANZARITE: And, Kieu, I'll send this</p> <p>13 to you as a separate document; okay? So we'll call</p> <p>14 this Exhibit 4. It is identified as the one page</p> <p>15 May 28, 2018, typewritten agreement with a signature</p> <p>16 line for Ronnie and Phyllis Jordan and Mowbray's</p> <p>17 authorized signatures one and two.</p> <p>18 BY MR. CATANZARITE:</p> <p>19 Q Okay. So can you place the year in which</p> <p>20 you received this document?</p> <p>21 A I -- it probably was -- I don't -- I don't</p> <p>22 think it was 2018. I'm thinking -- you know, I</p> <p>23 don't really know. I could see what office we were</p> <p>24 in, but I don't really recall the exact date. I'm</p> <p>25 sorry.</p>	<p>Page 42</p> <p>1 from Ronnie and/or Phyllis and/or Josh; correct?</p> <p>2 A Well, I can't really say the exact date.</p> <p>3 I'm sorry. I can't. I just remember where I was at</p> <p>4 and when they would bring it to me and ask me for my</p> <p>5 mother to sign. I can't even tell you what the date</p> <p>6 was.</p> <p>7 Q Yeah, I'm not asking you for the date. I</p> <p>8 understand that you can't do that. I'm trying to</p> <p>9 place it. If we say the move is on a date that</p> <p>10 we'll be able to identify by talking to others,</p> <p>11 perhaps, or we'll see another document, you</p> <p>12 estimated that approximately one year prior to that</p> <p>13 move, you had seen this document; correct?</p> <p>14 A I don't know if it was a year or -- like I</p> <p>15 said, I can't remember the year. I'm sorry.</p> <p>16 Q Can you give me a range or estimate? Six to</p> <p>17 nine months, six months to a year before the move?</p> <p>18 A Could be.</p> <p>19 Q Okay. So we -- are you saying could be as</p> <p>20 an estimate -- a best estimate?</p> <p>21 A Yeah, I'd say best estimate, yes.</p> <p>22 Q Thank you so much.</p> <p>23 Q Did you hand the document to Gloria?</p> <p>24 A Yes, I believe on occasion I did.</p> <p>25 Q Okay.</p>
<p>1 Q When you say you can see what office you</p> <p>2 were in, does that mean you have a recollection of</p> <p>3 receiving this when you were in the office before</p> <p>4 you moved?</p> <p>5 A Yes.</p> <p>6 Q Okay. And when did you -- when did the</p> <p>7 company, MTS, move into its new office?</p> <p>8 A I believe it was in 20 -- 2019.</p> <p>9 Q Okay.</p> <p>10 A 2020.</p> <p>11 Q Well, whenever --</p> <p>12 A I'm so sorry.</p> <p>13 Q Yeah, whenever the operations changed to the</p> <p>14 new location, you have a recollection of having</p> <p>15 received this document from Ronnie and/or Phyllis</p> <p>16 and/or Josh prior to that move; is that correct?</p> <p>17 A Yes.</p> <p>18 Q How much time prior to the move do you</p> <p>19 recall first seeing this document?</p> <p>20 A I really -- I can't recall the year. I</p> <p>21 can't remember the exact date.</p> <p>22 Q You can't remember an exact date, but your</p> <p>23 best estimate is approximately one year before the</p> <p>24 move into the new offices, you received -- first</p> <p>25 received Exhibit 4, the May 28th typewritten page</p>	<p>Page 43</p> <p>1 A I might have sent it to her lawyers --</p> <p>2 Q Okay.</p> <p>3 A -- first, and then my mom was aware that --</p> <p>4 that's what she wanted me to do.</p> <p>5 Q Okay. So your recollection is that you</p> <p>6 handed this document, Exhibit 4, to your lawyers,</p> <p>7 Mr. Kim and/or Mr. Cho for review, and you may have</p> <p>8 handed it to your mother at the same -- at or about</p> <p>9 the same time; is that correct?</p> <p>10 A Yes.</p> <p>11 Q All right. And what did your mother say</p> <p>12 about the document when she reviewed it?</p> <p>13 A I don't recall exactly what she said, just</p> <p>14 that she had to talk to, like I said, her lawyers</p> <p>15 about it.</p> <p>16 Q Okay. So you have a recollection, I take</p> <p>17 it, that you spoke with your mother about the</p> <p>18 one-page agreement, that she had reviewed it, and</p> <p>19 said she had to talk to her lawyers; is that</p> <p>20 correct?</p> <p>21 A Yes.</p> <p>22 Q Did she say anything else? Did she say</p> <p>23 anything about the terms that are contained in the</p> <p>24 document?</p> <p>25 A Um, at that time, I really -- I don't know</p>

<p style="text-align: right;">Page 46</p> <p>1 if she had some issues with it, but I can't recall 2 exactly, yeah, what they were.</p> <p>3 Q Your best recollection is your mother may 4 have had some issues with it, but you can't recall 5 exactly what they were; correct?</p> <p>6 A Yes.</p> <p>7 Q Okay. How would you characterize your 8 mother in this time period, 2018? What type of a 9 lady was she?</p> <p>10 A She was a very strong lady, she was tough.</p> <p>11 Q Yeah. All right. Well, I imagine she was. 12 Your father was injured in 1993 and never recovered. 13 She was taking care of him, I understand, in the 14 house contrary of nurses, correct, and doctors?</p> <p>15 A Yes.</p> <p>16 Q And that's a difficult thing to do to take 17 care of a loved one, her husband, in the house; 18 correct?</p> <p>19 A Yeah.</p> <p>20 Q In other words, your mom was so tough, she 21 wouldn't put him into any nursing home or anything. 22 She was going to take care of him; correct?</p> <p>23 A Yes.</p> <p>24 Q Okay. And -- and at the same time, she's 25 president of the business -- a successful business,</p>	<p style="text-align: right;">Page 48</p> <p>1 them stand out in your mind? In other words, 2 witnesses can have a recollection of hearing certain 3 things, but sometimes something will stand out in 4 their mind.</p> <p>5 Do any of the conversations that your mother 6 reported to you about her communication with Alan 7 stand out in your mind?</p> <p>8 A Um, no, not that I recall. Like I said, 9 she -- I can't -- no, not at this time. I can't 10 really recall. They might have talked about -- 11 yeah, I really don't recall exactly.</p> <p>12 Q I want to come back now to your mother's 13 reaction to the one-page agreement that appears in 14 Exhibit 4 --</p> <p>15 A Yeah.</p> <p>16 Q -- the May 28, 2018 one page typewritten 17 document. Your mother -- you've told us that your 18 mother's strong-willed; correct?</p> <p>19 A Uh-huh.</p> <p>20 Q You'll have to answer audibly yes or no, 21 please.</p> <p>22 A Yes.</p> <p>23 Q Okay. Your mother is savvy about what's 24 going on in the business, the revenue and expenses, 25 having talked with her comptroller; correct?</p>
<p style="text-align: right;">Page 47</p> <p>1 MTS; correct?</p> <p>2 A Yes.</p> <p>3 Q She was also owner of multiple pieces of 4 real estate; correct?</p> <p>5 A Yes.</p> <p>6 Q Okay. Fair to say she's handling millions 7 of dollars; correct?</p> <p>8 A Yeah. Yes.</p> <p>9 Q And did you -- was your mother -- by your 10 observation, was your mother savvy? In other words, 11 she knew what was going on, she knew what the fiscal 12 cash flows and business operations were, and what 13 she could spend when she could spend money and when 14 she couldn't spend money. Would that be fair to 15 say?</p> <p>16 A Yeah, when she would have, yeah, 17 conversations with Alan, yes.</p> <p>18 Q Okay. Did she ever have any conversations 19 with Alan in your presence?</p> <p>20 A Um, might have.</p> <p>21 Q Okay. Did she ever say to you or report to 22 you conversations that she had had with Alan -- Alan 23 Phaing?</p> <p>24 A Yeah, I'm sure she has, yes.</p> <p>25 Q Okay. Do you recall any of them? Do any of</p>	<p style="text-align: right;">Page 49</p> <p>1 A Yeah.</p> <p>2 Q And she would not -- if she disagreed with 3 something, she would tell you about it; correct?</p> <p>4 A Yes.</p> <p>5 Q And she didn't say anything specifically 6 about this one-page document that she disagreed 7 with, did she?</p> <p>8 A Um, I don't know if she said anything 9 about -- she might have said that, yeah, she wasn't 10 okay with some of the things. That's why she had to 11 talk to her lawyers.</p> <p>12 She wasn't okay with -- I don't know the 13 specifics, but -- I don't know if she was okay with 14 the vehicles, the -- I don't know -- the houses. 15 She just -- yeah, I mean, I really don't know. She 16 just had issues with it. That's why she had to talk 17 to her lawyers.</p> <p>18 Q Okay. I understand that, and I got that. I 19 gleaned that from your earlier reporting to us of 20 what your mother said. I'm searching for if there 21 is anything that she said no way, no how I didn't 22 agree to that.</p> <p>23 A Um, I think for sure she wasn't probably 24 okay with the ten percent --</p> <p>25 Q Okay.</p>

<p>1 A -- or the -- I think that was discussed 2 later. Maybe the -- the vehicles, the -- but then, 3 yeah, I think there was a few things that she wasn't 4 okay with.</p> <p>5 Q Okay. And when you say I think she said, 6 are you saying -- do you have a specific 7 recollection of the words she used to convey to you 8 what you just said?</p> <p>9 A Yes, I think she had more conversations, 10 like I said, with our lawyers about that --</p> <p>11 Q Fair enough.</p> <p>12 A -- when they talked about it and then they 13 had came to the agreement of the contract which 14 Ronnie signed. So I feel like she had those 15 conversations.</p> <p>16 Q Okay.</p> <p>17 A Like I said -- 18 (Technical glitch. Inaudible.)</p> <p>19 THE REPORTER: I'm sorry. My audio cut out 20 for a second. I didn't hear the last part of the 21 question -- I mean answer.</p> <p>22 THE WITNESS: I believe that she just was 23 not okay with some of the things. That's why she 24 wanted to go over it with her lawyers to agreement 25 for where they could come to agreement with Ronnie.</p>	<p>Page 50</p> <p>1 about Gloria's supposed disagreement with the ten 2 percent.</p> <p>3 A I don't think that that was spoken to Ronnie 4 at all. Like I said, it was spoken with our 5 lawyers, and she wasn't okay with it.</p> <p>6 Q Okay. So now let's go -- let's go back to 7 did she ever -- did she report to you that she ever 8 had anyone who -- who she had entered into a 9 contractual agreement that offered a percentage of 10 profits?</p> <p>11 A I don't -- I'm not sure about that.</p> <p>12 Q Okay. Are you aware of anyone that works 13 for the company -- any executive that works for the 14 company that had a percentage of profits?</p> <p>15 A No, I'm not.</p> <p>16 Q Okay. Is that because your mother would 17 never agree to such an agreement?</p> <p>18 A I'm not sure. Just for this specific, the 19 ten percent, she was not okay with that. I'm not 20 sure about prior or -- just I know that she referred 21 to something that she wasn't okay with that.</p> <p>22 That's, like I said, she spoke to her 23 lawyers, and I think that they had come to 24 agreement. I'm not sure what that was, but she was 25 not okay with the ten percent. No, she wasn't.</p>
<p>1 MR. CATANZARITE: Okay.</p> <p>2 BY MR. CATANZARITE:</p> <p>3 Q So I'm going to go back to the specifics. 4 What did she specifically say, if anything, about 5 the ten percent?</p> <p>6 A Um, I believe she wasn't okay with that.</p> <p>7 Q Well, when you say someone's not okay with 8 it, they're not okay with what the ten percent 9 applies to? Is that what she was not okay with?</p> <p>10 A Yes, I think so, yes. She wasn't okay with 11 that.</p> <p>12 Q Okay. So she was okay to using ten percent 13 but not what it applied to. Is that your 14 understanding?</p> <p>15 A No. I don't know exactly what it was. Just 16 said she had issues with the ten percent of the --</p> <p>17 Q All right. Did she think the number was 18 less than ten percent, did she think the number was 19 no ten percent, did she think it was five percent, 20 eight percent? Did she say anything?</p> <p>21 A I think that she just wasn't okay with it, 22 period. I don't know. She was just -- she was okay 23 with not the ten percent.</p> <p>24 Q Okay. So -- so now tell me -- tell me what 25 reporting did you -- you or Gloria have with Ronnie</p>	<p>Page 51</p> <p>1 Q Okay. So now what I'm asking is you 2 understood as you handed this letter to your mother 3 that Ronnie and Phyllis understood that Ronnie was 4 received ten percent of profits; correct?</p> <p>5 A I think I learned that after.</p> <p>6 Q Okay.</p> <p>7 A Or the discussion, like I said.</p> <p>8 Q Okay. So did anyone report to Ronnie that 9 there's a disagreement as to the ten percent?</p> <p>10 A I'm not sure.</p> <p>11 Q Okay. Now, your mother -- would it be fair 12 to say your mother is strong but fair?</p> <p>13 A Um, yeah. Yes.</p> <p>14 Q Would your mother go back on her word? I 15 mean, if she agreed to something or if Rick had 16 agreed to something on her behalf, would she try to 17 change it after someone has put a year or more at 18 service to the company which she --</p> <p>19 MR. CHO: Objection. Lacks foundation.</p> <p>20 Incomplete hypothetical. Calls for speculation.</p> <p>21 Answer if you know.</p> <p>22 THE WITNESS: Can you repeat that?</p> <p>23 MR. CATANZARITE: Kieu, can you read it 24 back?</p> <p>25 THE REPORTER: Would your mother go back on</p>

<p style="text-align: right;">Page 54</p> <p>1 her word? I mean, if she agreed to something or if 2 Rick had agreed to something on her behalf, would 3 she try to change it after someone has put a year or 4 more at service to the company which she -- and it 5 got cut off with the objection.</p> <p>6 THE WITNESS: I think you'd have to ask her 7 that.</p> <p>8 MR. CATANZARITE: Okay.</p> <p>9 THE WITNESS: I don't think -- first of all, 10 Rick would have no authority to do that.</p> <p>11 BY MR. CATANZARITE:</p> <p>12 Q Why do you say that?</p> <p>13 A Because she's -- she had the last say so. 14 That's why they knew that she needed to sign this.</p> <p>15 Q Who's the they knew?</p> <p>16 A Phyllis, Ronnie.</p> <p>17 Q They knew what?</p> <p>18 A That my mom had to be okay with this and 19 sign it.</p> <p>20 Q Well, it doesn't have Gloria on here as the 21 signature.</p> <p>22 A Well, they gave it to me and they would say 23 can you please have your mother sign this.</p> <p>24 Q Okay.</p> <p>25 MR. CHO: Hey, Ken --</p>	<p style="text-align: right;">Page 56</p> <p>1 communicating with Ronnie. Was your mother 2 communicating with Ronnie directly?</p> <p>3 A I don't believe so. I can't recall.</p> <p>4 Q All right. And so Rick's communicating with 5 Ronnie and getting Ronnie to relocate. You 6 understand Ronnie relocates -- Ronnie becomes 7 employed.</p> <p>8 You may not understand where he relocated 9 from, that's fair, but he became employed by the 10 company; correct?</p> <p>11 A Yes.</p> <p>12 Q And you're aware of an announcement that 13 went out because he became employed by the company; 14 correct?</p> <p>15 A Yes.</p> <p>16 Q Now, when you saw this ten percent referred 17 to in this document, did you all talk with Rick to 18 figure out what he had said?</p> <p>19 A I'm not sure. My mom had that conversation.</p> <p>20 I -- I'm not sure.</p> <p>21 Q Is it fair -- at this time, do you recall 22 any conversations you had with Rick or that you 23 overheard anyone have with Rick about the ten 24 percent?</p> <p>25 A No, I don't recall.</p>
<p style="text-align: right;">Page 55</p> <p>1 THE WITNESS: Multiple times.</p> <p>2 MR. CHO: Hold on. Hold on a second. Ken, 3 it's been about an hour seven minutes. When you 4 think it's appropriate, I'd like a short break.</p> <p>5 MR. CATANZARITE: Sure. Give me a couple 6 minutes on this subject, and then we'll take a 7 break, if that's okay with the witness.</p> <p>8 MR. CHO: Yeah, that's fine.</p> <p>9 MR. CATANZARITE: Is that okay with you, 10 Robin? Is that okay with you, Robin, a few more 11 minutes on this subject?</p> <p>12 THE WITNESS: Yeah, that's fine.</p> <p>13 MR. CATANZARITE: Okay. Thank you.</p> <p>14 BY MR. CATANZARITE:</p> <p>15 Q So I want to understand about this document 16 and the process. You say Rick didn't have the 17 authority. What authority -- why do you say that if 18 Rick is talking to Ronnie Jordan? You understood he 19 was talking to Ronnie Jordan; correct?</p> <p>20 A Yes.</p> <p>21 Q Okay. And you understand that you were 22 trying to recruit Jordan to be CEO and president of 23 the company; correct?</p> <p>24 A Yes.</p> <p>25 Q Okay. So you -- he was -- he, Rick, was</p>	<p style="text-align: right;">Page 57</p> <p>1 Q Okay.</p> <p>2 MR. CATANZARITE: Let's take -- is ten 3 minutes okay with you, Stephen?</p> <p>4 MR. CHO: Yes, that sounds great. Thank 5 you.</p> <p>6 MR. CATANZARITE: Robin, is that okay with 7 you?</p> <p>8 THE WITNESS: Yes. Thank you.</p> <p>9 MR. CATANZARITE: Okay. So let's come back 10 at 10:20, please.</p> <p>11 THE WITNESS: Okay.</p> <p>12 THE VIDEOGRAPHER: Going off the record at 13 10:09 a.m.</p> <p>14 MR. CATANZARITE: Thank you. (Whereupon a short break was taken 15 from the proceedings.)</p> <p>16 THE VIDEOGRAPHER: The time is 10:24 a.m. 17 We're back on the video record.</p> <p>18 MR. CATANZARITE: Okay.</p> <p>19 BY MR. CATANZARITE:</p> <p>20 Q Robin, you understand you're still under 21 oath.</p> <p>22 A Yes.</p> <p>23 Q All right. Robin, tell me when you had this 24 recollection of speaking with Gloria about</p>

<p style="text-align: right;">Page 58</p> <p>1 Exhibit 4. And I can put that back up if you need 2 that. Are you able to see Exhibit 4 again? 3 A Yes. 4 Q Okay. Can you tell me -- I want to be 5 clear. You didn't talk with Gloria about Rick's 6 discussions with Ronnie, is that correct, concerning 7 his employment? 8 A Right. Correct. 9 Q Okay. Can you tell me why -- if Rick was 10 hiring Ronnie, why you and Gloria would not talk to 11 Rick? 12 A I -- I'm not sure if my mom spoke to him 13 about it. She may have, but -- yeah, I'm not sure. 14 She might have spoken, I'm sure, with him, but I -- 15 I wasn't present. 16 Q Okay. 17 A Or I might have been. I can't recall 18 exactly. 19 Q Okay. So now let's talk about what you 20 recall about communications that you overheard or -- 21 between Ronnie and Gloria. Do you recall any 22 conversations that you observed between Gloria and 23 Ronnie or Gloria and Phyllis? 24 A No. I'm sorry. I didn't ever recall -- I 25 don't recall those.</p>	<p style="text-align: right;">Page 60</p> <p>1 Q Okay. 2 A -- to her house. 3 Q On how many occasions did Ronnie and Phyllis 4 come to your mother's house when you were present? 5 A I can't really recall exactly how many. 6 Q Can you tell me your first recollection of 7 the year that Ronnie and Phyllis came to your 8 mother's house? Was it the holiday season, 9 Thanksgiving, Christmas 2018? 10 A It could have been, but I don't remember 11 exactly the time and day that they came, what times 12 those were that -- yeah, I don't -- I don't really 13 recall the dates. 14 Q Okay. Do you recall Ronnie and Phyllis 15 being at various holiday gatherings at your mother's 16 house? 17 A They could have been. 18 Q Okay. When you say could have been, does 19 that mean you recall that they were there, but you 20 can't recall the specifics? 21 A Yeah, I can't recall the specifics exactly 22 when they were at our house. 23 Q Okay. Is it fair to say that -- that you 24 and Rick and Ricky and Gloria considered Ronnie and 25 Phyllis part of the family?</p>
<p style="text-align: right;">Page 59</p> <p>1 Q Okay. Do you recall in May of 2019 2 purchasing a house on Lucas Lane? 3 A Yes. 4 Q And when I say you, I mean Mowbray's -- 5 MT -- I wrote this down and I -- oh, MWP, Mowbray's 6 Waterman Property. Forgive me. MWP. So MWP bought 7 Lucas Lane. What's Lucas Lane? 8 A It's one of our residence that we had 9 purchased for Ronnie and Phyllis to live in during 10 their employment. 11 Q Okay. And did you deliver that house to 12 Ronnie and Phyllis with your mother present? 13 A I believe that I went to sign it because it 14 was under the LLC, so I was able to sign that. She 15 didn't have to. 16 Q Do you recall your mother -- do you recall 17 your mother ever being at Lucas Lane? 18 A I don't believe she ever went there, no. 19 Q Okay. 20 A We might have drove past it or something, 21 but I don't -- I don't -- yeah, I don't recall. 22 Q Do you recall your mother visiting Ronnie 23 with Ronnie and Phyllis at her house? 24 A They might have came. I don't know if I 25 recall the specifics, but I'm sure they did come --</p>	<p style="text-align: right;">Page 61</p> <p>1 A Um, yeah, I -- did my mom feel that way? 2 I'm sure that we had more -- because, you know, I 3 was in the office day to day, so probably -- you 4 know, I probably felt that, but yes, they were nice 5 people. Yes, of course, yeah. 6 Q Okay. And -- and in the time period from 7 Ronnie's hire until the time when Rick is let go in 8 January of 2020, is it fair to say things were going 9 well? 10 A Um, yes. 11 Q Okay. Is it fair to say things were going 12 better than they ever had for MTS? 13 A Around that time, I believe we were doing 14 good, yes. 15 Q Okay. I know you were doing well, but my 16 question is a little more refined. Is it fair to 17 say that in 2019 and 2020 and 2021 that MTS was 18 going better -- doing better than it ever had? 19 A We were doing good, yes. Yes, we were doing 20 good. Like I said, I didn't -- I couldn't tell you 21 about financials. I wasn't part of that. Like I 22 really -- I feel like yes, we were doing good, we 23 were doing good. 24 Q In other words, fair to say that the family 25 was -- was receiving distributions, your mother,</p>

Page 62
 1 from the company in millions of dollars per year;
 2 correct?

3 A Like I said, I'm not sure about all that.
 4 Like, I'm not -- yeah, I don't know. I wouldn't say
 5 that we were getting millions. I wouldn't say that.
 6 You know, it costs a lot to run a business, so I
 7 wouldn't say that she was getting millions of
 8 dollars, no.

9 Q Okay. Do you have a recollection about what
 10 the finances were in 2019 and 2020?

11 A To be honest, you know, I'd say no. I know
 12 that we were paying our bills, we were, you know,
 13 okay. But to tell you the financial situation, I
 14 couldn't tell you the dollar amount. I wasn't
 15 involved in that. We have, like I said, people that
 16 took care of that for us.

17 Q Let me show you Exhibit 2.

18 (Whereupon Exhibit 2 was marked for
 19 identification.)

20 Q Can you see Exhibit 2 on your screen?

21 A Yes.

22 Q Okay. So Exhibit 2 on your screen, this is
 23 a -- let's see. I think it's a six-page document.
 24 Unfortunately, I didn't -- I didn't -- I didn't -- I
 25 didn't paginate it.

Page 64
 1 A Like I said, no, it doesn't. I don't recall
 2 this. I -- I couldn't tell you anything about our
 3 finances back then. I really don't recall. I
 4 didn't -- like I said, I don't -- I don't know how
 5 to read these. I -- I don't know. Sorry.

6 Q You don't know how to read these?

7 A Yeah, I don't. We had CPAs and accountants.
 8 Q Okay. So this one shows that as of April of
 9 20 -- April 30th of 2018, the company had lost,
 10 according to this record, \$4,480,000. Do you see
 11 that?

12 A Yes.

13 Q Okay. Now, so assuming that's the case, do
 14 you recall discussing bringing in -- the need to
 15 bring in Ronnie because the company was doing
 16 poorly?

17 A I don't remember that's the reason why we
 18 brought him in, like I said.

19 Q Okay. Do you recall -- after Rick was
 20 fired, do you recall a conversation where you were
 21 on the phone with Ronnie and you handed the phone to
 22 your mother?

23 A You could remind me of what was said. I
 24 mean, I don't --

25 Q I'll do my best. Do you recall Gloria

Page 63
 1 It says right here we need to generate 6.5 M
 2 per month to break even. Do you see that?

3 A Yes.

4 Q And -- and does that refresh your
 5 recollection that in 2018, 2017 by -- by this list
 6 here that -- in 2017 that you needed 6.5 million of
 7 receipts per month to break even?

8 A Well, me seeing this right now is showing
 9 me, but like I said, I didn't take care of our
 10 finances back then. But you showing me now, I can
 11 can see that that's how much we needed.

12 Q Okay. But I -- it would be unfair for me to
 13 ask you to tell me about it right now. Do you have
 14 a recollection of knowing that back in April 2018?

15 A I don't.

16 Q Okay.

17 A I don't.

18 Q Here's another report for 2018. And you'll
 19 see here that at the bottom here, it talks about
 20 January through May of 2018 and talks about total
 21 revenues of \$25,839,000 versus expense monthly rents
 22 of \$28,727,000.

23 Does that refresh your recollection of how
 24 the company was doing in April of 20 -- as of
 25 May 2018?

Page 65
 1 saying to Ronnie that he had to promise her he would
 2 never leave Mowbray's?

3 A Um, she -- she might have said that, yes.

4 Q Okay. All right. Well, you were in her
 5 presence and could hear it -- hear what she was
 6 saying, could you not?

7 A I could, sir, but you're talking about --
 8 I'm so sorry -- years ago. This was -- you said it
 9 was 2019?

10 Q No, no. I'll be precise. I'll refine the
 11 question for you. This is -- placing this, this is
 12 after Rick Mowbray is discharged. And I believe
 13 that was -- I'll tell you from the records I've
 14 looked at -- and you may have a different
 15 recollection -- is January 23rd, 2020. But it's
 16 January 2020.

17 This is a conversation that occurs between
 18 yourself and Ronnie after Rick is discharged and
 19 your mother gets on the phone with Ronnie and --
 20 because there's, apparently, something going on
 21 about Rick wants to come back and people don't want
 22 him to come back and Ronnie offers to leave.

23 Do you recall that?

24 A You know what? I do not recall that. I do
 25 not recall that Rick wanted to come back. I'm so

<p style="text-align: right;">Page 66</p> <p>1 sorry. Yeah, I do not recall that.</p> <p>2 Q Okay. Do you recall hearing Gloria say to</p> <p>3 Ronnie in a phone conversation where you hand your</p> <p>4 phone to -- you're on the phone with Ronnie and you</p> <p>5 hand the phone to Gloria where she wants to</p> <p>6 emphasize to Ronnie that -- and says to him you must</p> <p>7 promise me that you'll never leave Mowbray's.</p> <p>8 A That -- that could have -- that could have</p> <p>9 happened, yes, but I don't recall that. But I'm</p> <p>10 sure that -- I could see, yeah, that she said that.</p> <p>11 Q Why do you say you could see she could say</p> <p>12 that?</p> <p>13 A Because, you know, his -- you know, they --</p> <p>14 just say that, you know, they were nice people and</p> <p>15 that -- that she could say that. You know, I mean,</p> <p>16 I think that -- yeah, Rick's rants, she probably</p> <p>17 felt bad about that, you know. I could see that she</p> <p>18 said that, but I really don't recall the specifics</p> <p>19 of her saying that. I don't recall that.</p> <p>20 Q You said something -- something about she</p> <p>21 might have said something, and I didn't catch the</p> <p>22 full response, something that she said. Can you</p> <p>23 repeat that?</p> <p>24 A Just like I said, she might have felt bad</p> <p>25 for the rants that, you know, he would text Ronnie,</p>	<p style="text-align: right;">Page 68</p> <p>1 Let me see if I can -- I'm trying to make it</p> <p>2 smaller.</p> <p>3 Do you -- do you recall receiving or</p> <p>4 reviewing documents that were produced by -- by MTS</p> <p>5 recently as part of this case, balance sheets for</p> <p>6 MTS as of December 31st, 2018?</p> <p>7 A You know, sir, I was given, like, 1200</p> <p>8 documents. And I probably did see this, but like I</p> <p>9 said, I'm so bad at math that I really didn't look</p> <p>10 at these. I'm sorry.</p> <p>11 Q Let me -- let's just look at this document</p> <p>12 which is the profit and loss for January through</p> <p>13 December 2018. It shows a gross -- it says total</p> <p>14 income of \$92,621. Do you see that?</p> <p>15 A Yes.</p> <p>16 Q Okay. And it shows a profit of -- net</p> <p>17 ordinary income, it says net ordinary income here is</p> <p>18 \$1,684,000. Do you see that?</p> <p>19 A Yes.</p> <p>20 Q All right. So in 2018 after Ronnie is</p> <p>21 brought on board, there's a net income from</p> <p>22 operations of roughly \$1.684 million. Do you see</p> <p>23 that?</p> <p>24 A Yes.</p> <p>25 Q Do you recall we earlier looked at a</p>
<p style="text-align: right;">Page 67</p> <p>1 you know, and I feel that, you know, she probably</p> <p>2 just felt bad about that.</p> <p>3 Q Okay. So in other words, Rick's long text</p> <p>4 messages to shall we say quite a few folks --</p> <p>5 A Yes.</p> <p>6 Q -- and -- and your mother was on those text</p> <p>7 messages, as well, wasn't she.</p> <p>8 A She probably was, but I doubt that she read</p> <p>9 them. He would send hundreds and hundreds, so I'm</p> <p>10 sure she was.</p> <p>11 Q Okay. All right. I've seen some. Yes.</p> <p>12 Okay. So let me show you another document. I'm</p> <p>13 going to -- this is -- let me share screen. I'm</p> <p>14 going to mark this as exhibit --</p> <p>15 THE REPORTER: I'm sorry. Eight?</p> <p>16 MR. CATANZARITE: H. H. We're going to</p> <p>17 have some letters and some numbers. I'm not trying</p> <p>18 to confuse everyone, but some of these are documents</p> <p>19 that were produced by your lawyers, so I'm going to</p> <p>20 keep the same labeling for convenience purposes.</p> <p>21 (Whereupon Exhibit H was marked for</p> <p>22 identification.)</p> <p>23 BY MR. CATANZARITE:</p> <p>24 Q Do you -- did you have -- do you recall</p> <p>25 having looked at the document production from MTS?</p>	<p style="text-align: right;">Page 69</p> <p>1 document that showed as of April of 2018 that the</p> <p>2 period -- that the company had lost \$4,480,000</p> <p>3 through the first four months; correct?</p> <p>4 A Yes.</p> <p>5 Q All right. So in -- in the sense, bringing</p> <p>6 Ronnie on board is pretty darn good for the company</p> <p>7 for Mowbray's so far; correct?</p> <p>8 A Um, yeah. Yes.</p> <p>9 Q Now I'm going to go to December 31st, 2019.</p> <p>10 And to put this in perspective, Rick is fired right</p> <p>11 after this year concludes. He's fired in January of</p> <p>12 2020.</p> <p>13 Do you recall how much total revenue and</p> <p>14 profits Mowbray's had in January -- from 2019?</p> <p>15 A No, I don't.</p> <p>16 Q Okay. I'm going to show you that in --</p> <p>17 well, I'll first show you the total revenue. So in</p> <p>18 January to December 2019, total income was</p> <p>19 \$214,828,924. Do you see that?</p> <p>20 A Yes.</p> <p>21 Q Okay. So double what 2018 was; correct?</p> <p>22 A Uh-huh, yes.</p> <p>23 Q And the profits from operations were -- net</p> <p>24 ordinary income was \$13,748,498; correct?</p> <p>25 A Yes.</p>

<p style="text-align: right;">Page 70</p> <p>1 Q Okay. Now, if we look at what the 2 distributions were -- and that's on page -- 3 MR. CATANZARITE: Forgive me, Kieu. I 4 should have said. That's on page TOMTS -- MTS 3231 5 is the page with the profits on it, net ordinary 6 income \$13,748,000. Revenue is shown on page 3230. 7 BY MR. CATANZARITE: 8 Q And I want to show you something right here. 9 This is distributions. So total distributions, 10 according to this, distributions were \$4,000,250 11 [sic] -- 12 A Uh-huh. 13 Q -- to your mother. Do you see that? 14 A I don't think that was to my mother. I'm 15 not a CPA, but I'm sure that was definitely not in 16 her bank account. So like I said, I'm not a CPA. 17 Single corp, there's a lot of distributions. I 18 don't understand it, but yeah, I see that. 19 Q Okay. 20 A But I'll tell you that was not in her bank 21 account. 22 Q Well, how much was in her bank account that 23 you recall? 24 A There was no \$4 million. I'll tell you 25 that.</p>	<p style="text-align: right;">Page 72</p> <p>1 that? 2 A Yes. 3 Q I mean, you understand that distributions 4 are transfers from the company to the shareholder; 5 correct? 6 A But it's -- it's more than goes into that. 7 It's -- yeah, it's just -- there's a lot that goes 8 into it. Like I said, I'm not a CPA. You'd have to 9 talk to him about that. It's not like it's a check 10 given to my mom. There's other assets, like I said. 11 Q But you would agree with me that according 12 to this, the distributions were \$7 million; correct? 13 A That -- yeah, I -- I guess so. 14 Q Okay. Now, let's go to 2020. In 2020, do 15 you recall -- now, 2020 is the year in which Rick is 16 discharged the end of January, Ronnie continues in 17 his role, and sometime during the year, he's asked 18 to step down; correct? 19 A Yes. 20 Q Do you recall what type of year 2020 was? 21 A I don't recall the exact time, no. 22 Q Was it, again, double what 2019 had been? 23 A I don't recall. 24 Q You recall 2019 was \$220 million; correct? 25 A Right. What you showed me, yes.</p>
<p style="text-align: right;">Page 71</p> <p>1 Q How many millions was it? 2 A No millions. It was no millions. I could 3 tell you that. 4 Q How can you say that? 5 A Because I know. Because I could. I could 6 tell you that. Well, I couldn't tell you exactly, 7 but I -- (unintelligible) 8 THE REPORTER: I'm sorry. You cut out at 9 the end there. 10 THE WITNESS: Like I said, I'm not a CPA, 11 but that wasn't -- there's taxes. It goes back to 12 the business. Like I said, I'm not a CPA. And this 13 is -- I'm not sure about -- this is my mother's. I 14 don't know where -- where -- what we're trying to 15 get at. 16 BY MR. CATANZARITE: 17 Q Well, we were talking about distributions 18 earlier. 19 A Right, and you said that this was given to 20 my mother. Like I said, I'm not a CPA, and I don't 21 think that this was a check given for \$4 million to 22 my mother. You'd have to talk to our CPA about 23 that. You'd have to depose him, but yeah. 24 Q Okay. Well, there's another account that 25 says distribution that says \$2,767,478. Do you see</p>	<p style="text-align: right;">Page 73</p> <p>1 Q And 2019 -- 2018, it was \$92 million; 2 correct? 3 A I guess that's what you're showing me, yes. 4 Q And then if we go to 2020 -- in 2020 on page 5 3234 of Exhibit H, the revenue total income is 6 \$470,525,295; correct? 7 A Yes. 8 Q It's double 2019 which was 220,000 which 9 doubled 2018 which was 90 -- 92 -- I'm sorry. Did I 10 say -- I'm going to rephrase the question. My 11 apologies, Robin. 12 Anyway, \$470 million is double 2020 which 13 was -- \$470 million -- I'll restart. New question. 14 \$470 million in 2020 was more than double 2019 which 15 was \$220 million; correct? 16 A Yes. 17 Q And 2019 was double the \$92 million in 2018; 18 correct? 19 A Yes. 20 Q And the profits -- let's look at the 21 profits. The profits in 2020, the net operating 22 income, which appears on page 3235 was \$69,630,755; 23 correct? 24 A That's what it looks like, yes. 25 Q Okay. And -- and if we go back and look at</p>

<p style="text-align: right;">Page 74</p> <p>1 our distributions which appears on page 3233, the 2 distributions were -- says \$3,453,623 to Gloria tax 3 and another \$3,593,978 to Robin tax. 4 A Yes. 5 Q Okay. Can you tell me, if you know, were 6 you a shareholder as of 2020? 7 A I wasn't a shareholder. I think I just -- 8 they had -- I think I had a percentage of the 9 company, but I don't think I was a shareholder. I 10 think I just had a percentage, but I don't believe I 11 was a shareholder. But I'm -- I don't think I was. 12 Q Well, according to this, if I add up the two 13 Gloria tax and Robin tax distributions and divide it 14 by -- divide it by the distribution you received, 15 you would be a 51 percent shareholder. 16 Do you recall being a 51 percent shareholder 17 in 2020? 18 A I don't think a shareholder is different 19 from the percentage of the company. Yeah, I 20 don't -- but -- I don't -- you have to 21 ask our corporate attorney. I don't think that's -- 22 I don't understand all that, but -- but yeah. 23 Like I said, you have to talk to our CPA how 24 this is all distributed, the S corp and all that, 25 because distributions is not like I think I got a</p>	<p style="text-align: right;">Page 76</p> <p>1 A I think so. 2 Q Okay. So in -- if I tell you that Ronnie 3 was asked to step down in October 2020, does that 4 reconcile with what your recall is? 5 A I thought they were at the office, but like 6 I said, I don't recall. 7 Q Let's look at the -- let's see. This is 8 Exhibit I which is Ronnie's employment agreement. 9 Hang on a second. I want to make sure this is the 10 right one with the date on it. Yeah. Okay. This 11 is -- I'm going to show you Exhibit I. 12 (Whereupon Exhibit I was marked for 13 identification.) 14 Q I'm going to put it on the screen for you. 15 Can you see Exhibit I on the screen now? 16 A Yes. 17 Q All right. So this is an employment 18 agreement. It says it's entered into as of 19 January 1, 2020. Did you ever read this document? 20 A To be honest, I really didn't. 21 Q Okay. And so I want to go to the end of 22 this document and -- because there's some signature 23 line here. You see that this is -- this appears to 24 be signed by Ronnie on -- after paragraph 29, and 25 then we have -- can you make out that signature that</p>
<p style="text-align: right;">Page 75</p> <p>1 check for this. It probably went back to the 2 company. I mean, I don't -- you have to, like I 3 said, talk to our CPA. 4 Q Okay. Let's talk about the move into the 5 office -- the new office. Where's the new office 6 located? 7 A It's in San Bernardino. 8 Q What street is it on? 9 A It's on Mill Street. 10 Q Okay. And where -- where was it before it 11 moved to Mill Street? 12 A It was on Business Center Drive in San 13 Bernardino. 14 Q Okay. Now, do you recall when that office 15 opened formally? 16 A Like I said, I'm so bad with years and 17 dates. I think -- what did we say it was, 2020? 18 Q Okay. Do you recall if Ronnie was asked to 19 step down before the office opened? 20 A I don't recall. I'm thinking that maybe he 21 was there, but then COVID was around that time where 22 they're working from home. I don't -- 23 Q Okay. Well, I want to orient you a little 24 bit. I won't mislead you, I promise. COVID started 25 in March of 2020; correct?</p>	<p style="text-align: right;">Page 77</p> <p>1 appears on -- 2 A Yeah, that's my signature. Like I said, I 3 probably went over it with my lawyers. But like I 4 said, my lawyers prepared this and -- 5 Q Well, don't tell me anything your lawyers 6 said. I'm just looking for the timing. So if I go 7 back to this, it's -- there's an SC, Stephen. Is 8 that Stephen Cho? Do you know? 9 A Yes. 10 Q Okay. And it says Wednesday, September 16th 11 at 6:56 p.m. Does that refresh your recollection of 12 when your signed page was sent over to Ronnie? 13 A I guess this is showing that it's around 14 that time. 15 Q Okay. And I'm going to go show you another 16 document. I want to show you Exhibit I. This is 17 Exhibit I. Can you see that on the screen? 18 A Yes. 19 THE REPORTER: Counsel, you have two Exhibit 20 I's. 21 MR. CATANZARITE: That wouldn't be very 22 good, would it? I have two Exhibit I's? Oh, I'm 23 sorry. I may have -- I may have mislabeled that. 24 Hold on a second. Exhibit I was the employment 25 agreement.</p>

<p style="text-align: right;">Page 78</p> <p>1 This, I will relabel to be -- I'm going to 2 relabel this to be Exhibit 7. I'm going to first 3 close this and reopen it.</p> <p>4 (Whereupon Exhibit 7 was marked for 5 identification.)</p> <p>6 BY MR. CATANZARITE:</p> <p>7 Q Do you see Exhibit 7 now?</p> <p>8 A Yes.</p> <p>9 Q Okay. Exhibit 7 is -- I'll identify as a 10 Robin Mowbray e-mail to Ronnie Jordan, Phyllis 11 Jordan, and Richard Mowbray dated 4/24/20. Do you 12 see that?</p> <p>13 A Yes.</p> <p>14 Q Okay. So this -- this document describes an 15 earlier e-mail or a later e-mail from Alan Phaing, 16 and we'll get -- we'll come to that. But this 17 document says on 4/15/20 that -- 4/24/20 that 18 certain things were changed in an employment 19 agreement.</p> <p>20 Do you see that?</p> <p>21 A Yes.</p> <p>22 Q Okay. Do you recall what was changed?</p> <p>23 A Um, at this -- I didn't -- I guess it's 24 saying that had to make some changes. The contract 25 does count. The future, including increases and</p>	<p style="text-align: right;">Page 80</p> <p>1 financials for 2020, PG&E work doesn't seem to 2 have -- the problem with PG&E doesn't seem to have 3 hurt the \$470 million of revenue; correct?</p> <p>4 A I don't recall. I don't know if we were 5 getting payments. I don't -- I don't -- like I 6 said, I don't know how to read these. I'm not an 7 accountant or CPA.</p> <p>8 Q Okay. If we look at exhibit -- again, 9 Exhibit I which is the financial statements -- or 10 Exhibit H which is the financial statements, the 11 revenue in 2019, the net income was \$13,748,000; 12 correct?</p> <p>13 A That's what it appears to be, yes.</p> <p>14 Q Okay. And distributions were substantial; 15 correct? Do you recall that, \$7 million?</p> <p>16 A Yeah, that's what it says.</p> <p>17 Q Okay. On page 3229. How much was Ronnie, 18 if you know, expecting his ten percent would -- 19 would be in 2019?</p> <p>20 MR. CHO: Objection. Calls for speculation. 21 Lacks foundation. If you know, go ahead and answer.</p> <p>22 THE WITNESS: I don't know. I don't know.</p> <p>23 MR. CATANZARITE: I'll withdraw the 24 question. That would be speculation.</p> <p>25 ///</p>
<p style="text-align: right;">Page 79</p> <p>1 premiums -- future, yeah, PG&E work -- so this is 2 Rick -- yeah, this is -- I don't recall, but this is 3 refreshing my memory.</p> <p>4 Q What was the status of PG&E at that time?</p> <p>5 A Um, I don't recall. I remember that work 6 was slow. I don't know exactly what was going on, 7 but I think --</p> <p>8 Q Okay. Did they file bankruptcy in January 9 of 2020 --</p> <p>10 A Yes.</p> <p>11 Q -- if you know?</p> <p>12 A Yes.</p> <p>13 Q Okay. So there was a problem with PG&E 14 because --</p> <p>15 A That's right. Yes.</p> <p>16 Q All right. So -- so the concern is -- part 17 of the concern for having this contract was what was 18 going on with PG&E; is that correct?</p> <p>19 A Yes.</p> <p>20 Q Okay. In other words -- I put it back on 21 the screen -- was there a concern that there would 22 be a downturn in PG&E work and that you might not 23 get paid?</p> <p>24 A Yes.</p> <p>25 Q However, if we look at -- if we look at the</p>	<p style="text-align: right;">Page 81</p> <p>1 BY MR. CATANZARITE:</p> <p>2 Q Did you -- did you have an understanding as 3 to what ten percent, if payable to Ronnie, would 4 have amounted to?</p> <p>5 A I wasn't sure, no.</p> <p>6 Q Okay. In 2020, without -- had ten percent 7 been payable to Ronnie Jordan, what would that have 8 amounted to?</p> <p>9 A Are you saying ten percent of the net 10 income?</p> <p>11 Q Yes.</p> <p>12 A Are you asking me what ten percent of that 13 is? I guess it's \$7 million. Like I said, I'm so 14 bad at math. I don't know.</p> <p>15 Q Well, I think --</p> <p>16 (Simultaneously speaking. Not reportable.)</p> <p>17 THE REPORTER: I didn't get that last part.</p> <p>18 THE WITNESS: I couldn't tell you. Like I 19 said, I --</p> <p>20 MR. CATANZARITE: Let me -- let me rephrase.</p> <p>21 THE WITNESS: You want me to get a 22 calculator and put ten percent of this? I can do 23 that for you.</p> <p>24 BY MR. CATANZARITE:</p> <p>25 Q Well, you were right. You said about</p>

<p style="text-align: right;">Page 82</p> <p>1 \$7 million; correct?</p> <p>2 A Okay. Okay. Yes.</p> <p>3 Q All right. In other words, \$69,630,755 is</p> <p>4 roughly \$70 million; right?</p> <p>5 A Yes.</p> <p>6 Q Ten percent of \$70 million is \$7 million;</p> <p>7 correct?</p> <p>8 A Yeah, but I don't -- I don't know if that</p> <p>9 was an agreement of the ten percent at that time.</p> <p>10 Like I said, my mother was not in agreement with</p> <p>11 that. So --</p> <p>12 Q Right. So if we look at this agreement</p> <p>13 which is Exhibit 4 --</p> <p>14 A Uh-huh.</p> <p>15 Q -- ten percent of -- of what purports to be</p> <p>16 in this one-page document -- and I understand that</p> <p>17 your mother disagreed with it and that others</p> <p>18 disagreed with it. That would be -- the ten percent</p> <p>19 was of the profits; correct?</p> <p>20 A If you're saying ten percent of profits,</p> <p>21 yeah, I guess -- yeah, I guess.</p> <p>22 Q All right. Now, Ronnie had already been</p> <p>23 there since May of 2018; correct?</p> <p>24 A I believe so.</p> <p>25 Q And the employment agreement that is offered</p>	<p style="text-align: right;">Page 84</p> <p>1 A Not with me, no.</p> <p>2 Q Okay. So if we looked at the typed version</p> <p>3 of the document, you estimated that you received</p> <p>4 this document, you say, roughly six months to a year</p> <p>5 before you moved into the new office; correct?</p> <p>6 A Like I said, I don't recall the exact date.</p> <p>7 I just remember we were at the other office, and</p> <p>8 I -- I can't give you an exact date when I received</p> <p>9 this.</p> <p>10 Q Okay. And so Ronnie -- and if the -- if I</p> <p>11 tell you the new office relocation was Jan -- was</p> <p>12 October 2020, that means that you received this</p> <p>13 document to be delivered to Gloria and discussed it</p> <p>14 with her as you described somewhere between</p> <p>15 October 2019 and roughly April 2020; correct?</p> <p>16 A Could have been, yes.</p> <p>17 Q Okay. And if we look at this April 2020 --</p> <p>18 I want to get to this April 2020 agreement again.</p> <p>19 Do you see April 2020?</p> <p>20 A Yes.</p> <p>21 Q That's April 24th of 2020. So is -- what I</p> <p>22 want -- I want to see is if I can refine, perhaps,</p> <p>23 your recollection of when you saw the May 28th</p> <p>24 typewritten document, the one page.</p> <p>25 Is it your recollection that the -- the</p>
<p style="text-align: right;">Page 83</p> <p>1 to him is -- is effective January 1st of 2020;</p> <p>2 correct?</p> <p>3 A I believe so.</p> <p>4 Q Okay. So Ronnie compensated for 2018 and</p> <p>5 2019.</p> <p>6 A I believe this isn't signed. The agreement</p> <p>7 was signed -- what's the date of this?</p> <p>8 Q Well, it's -- we don't have the date of when</p> <p>9 Ronnie signs it, but it's signed by you and</p> <p>10 transmitted by Mr. Cho to Ronnie on September 16th</p> <p>11 of 2020.</p> <p>12 A Okay. So I think that's when it was signed,</p> <p>13 2020.</p> <p>14 Q Okay. Okay. So was there any discussion</p> <p>15 about, gee, we better get a different agreement</p> <p>16 signed because we're going to owe Ronnie about</p> <p>17 \$7 million?</p> <p>18 A No.</p> <p>19 Q Was there ever any discussion about we</p> <p>20 better get a different agreement signed because ten</p> <p>21 percent would be millions of dollars due to Ronnie</p> <p>22 for '18 and '19?</p> <p>23 A No.</p> <p>24 Q Okay. Was that ever discussed at all what</p> <p>25 ten percent of 2018 and 2019 profits would be?</p>	<p style="text-align: right;">Page 85</p> <p>1 May 28, 2008, Exhibit 4 was handed to you to give to</p> <p>2 Gloria in April of 2020 -- approximately April about</p> <p>3 six months before the office move?</p> <p>4 A Like I said, I can't remember the exact</p> <p>5 date. I -- I just don't know.</p> <p>6 Q Okay.</p> <p>7 A I don't know when it was. If it was before</p> <p>8 that, I just don't know.</p> <p>9 Q Yeah, the reason -- the reason I'm asking</p> <p>10 these questions is because there's -- there's no</p> <p>11 discussion of an employment agreement for Ronnie</p> <p>12 tendered before this document that's sent sometime</p> <p>13 in April 2020; is that correct?</p> <p>14 A I believe so.</p> <p>15 Q Okay. And -- and --</p> <p>16 A I'm not certain.</p> <p>17 Q And you guys know at the time, meaning you</p> <p>18 and your mom and Rick -- well, Rick -- you don't</p> <p>19 discuss -- I'll withdraw the question. New and</p> <p>20 fresh question.</p> <p>21 Is it your testimony that you have no</p> <p>22 recollection of ever discussing with Rick Mowbray</p> <p>23 the ten percent bonus that Ronnie is asking about in</p> <p>24 his May 28, 2008, typewritten page?</p> <p>25 A Yeah, I don't recall. I don't recall ever</p>

<p>1 having a discussion with Rick.</p> <p>2 Q Okay. And can you tell me why no one talked</p> <p>3 to Rick? Why didn't you or Gloria talk to Rick</p> <p>4 about this?</p> <p>5 A I'm not sure if my mom talked to him about</p> <p>6 this. Me personally, I don't recall talking about</p> <p>7 this to Rick. My mom could have.</p> <p>8 Q Okay. Got it. Okay. I want to ask you</p> <p>9 about the announcement that Rick makes. This is</p> <p>10 in -- Exhibit 6. I've put Exhibit 6 on the screen.</p> <p>11 (Whereupon Exhibit 6 was marked for</p> <p>12 identification.)</p> <p>13 Q Can you see it?</p> <p>14 A Yes.</p> <p>15 Q All right. Now, Rick Mowbray announces to</p> <p>16 all Mowbray's employees Ronnie's coming on board.</p> <p>17 Do you have a recollection of this announcement?</p> <p>18 A Um --</p> <p>19 Q Three pages --</p> <p>20 A I believe I might have looked over this --</p> <p>21 this -- this weekend when I was given some of these</p> <p>22 documents.</p> <p>23 Q Did you review it at the time it was posted</p> <p>24 to all of the employees?</p> <p>25 A I might have.</p>	Page 86	<p>1 bit different question. Had you -- had you realized</p> <p>2 that Rick posted this when he shouldn't have, it</p> <p>3 would have been withdrawn or replaced by somebody</p> <p>4 else writing a correction; is that correct?</p> <p>5 A I just -- I think this is pretty much</p> <p>6 summoned up to announce that he's coming to work for</p> <p>7 us.</p> <p>8 Q Okay.</p> <p>9 A I think -- nobody had an issue with Ronnie</p> <p>10 coming to work with us. No, not at all.</p> <p>11 Q Okay. That's what I was getting at.</p> <p>12 A Yes.</p> <p>13 Q So this was a favorable affirmation, so to</p> <p>14 speak, or verification that Ronnie was coming to</p> <p>15 work for MTS by this announcement to all of its</p> <p>16 employees by Rick; correct?</p> <p>17 A I don't know if anybody else -- I don't</p> <p>18 recall if anybody else made an announcement, but</p> <p>19 this is definitely from Rick, yes. I don't recall</p> <p>20 if anybody else made an announcement, but this was,</p> <p>21 yeah, made by Rick, yes.</p> <p>22 Q Have -- have you -- have you ever heard the</p> <p>23 term buzz -- that there was a buzz about something?</p> <p>24 A Yeah, I've heard that term.</p> <p>25 Q Okay. Would this -- would it be fair to say</p>	Page 88
<p>1 Q Okay. This is Bates -- plaintiff's Bates</p> <p>2 page number 445 through 47.</p> <p>3 A Uh-huh.</p> <p>4 Q Do you have a recollection of reading this</p> <p>5 beginning to end at the time Rick posted it?</p> <p>6 A I might have.</p> <p>7 Q Did you disagree with any of it?</p> <p>8 A I don't know. I don't -- I would have to</p> <p>9 read it again.</p> <p>10 Q Did your -- to your knowledge, did your</p> <p>11 mother, Gloria, read this posting?</p> <p>12 A I'm not sure.</p> <p>13 Q Okay. Can you tell me why Rick made this</p> <p>14 posting?</p> <p>15 A I'm not sure.</p> <p>16 Q You sort of laughed as you said that.</p> <p>17 A He would do a lot of -- yeah, he would do a</p> <p>18 lot of posting and all that.</p> <p>19 Q Okay. But, I mean, did -- did Mowbray's --</p> <p>20 MTS take issue with anything that Rick said in this</p> <p>21 announcement?</p> <p>22 A I would have to read it right now, sir,</p> <p>23 and -- and go back. At the time, I don't know. I</p> <p>24 would have to read it right now.</p> <p>25 Q Well, let me ask you a question -- a little</p>	Page 87	<p>1 that this posting and announcement created a buzz at</p> <p>2 MTS?</p> <p>3 A No, I wouldn't say that, no. I don't -- I</p> <p>4 don't -- a buzz, no. I think it was just saying</p> <p>5 that Ronnie's going to be CEO.</p> <p>6 Q Okay. Would it be fair to say that there</p> <p>7 was an excitement about Ronnie coming to work for</p> <p>8 MTS?</p> <p>9 A From Rick, yeah, I could see definitely. I</p> <p>10 think I was seeing that they had a work relationship</p> <p>11 before, so he was definitely, yeah, excited about</p> <p>12 it.</p> <p>13 Q Well, would it be fair to say that Mowbray's</p> <p>14 itself -- the company itself, yourself, Gloria,</p> <p>15 Denise that there was an excitement about Ronnie</p> <p>16 coming to work for MTS?</p> <p>17 A Um, sure. Yes, sure.</p> <p>18 Q And, in fact, that hire, the hire of Ronnie</p> <p>19 Jordan, resulted in positive revenues for 2018 in</p> <p>20 \$92 million; correct?</p> <p>21 A I don't know if I would say that, sir. Like</p> <p>22 you said, the men are out there in the field are the</p> <p>23 ones that do the work, are the ones that -- we've</p> <p>24 had contracts in place. We've had Edison contracts</p> <p>25 in place for years.</p>	Page 89

<p style="text-align: right;">Page 90</p> <p>1 But he was pay very big part of it. Yes, he 2 knew this business, but I wouldn't say it was all 3 contributed to that.</p> <p>4 Q Okay. And in -- in 2019, MTS does 5 \$220 million in revenue. Do you give Ronnie Jordan 6 any credit for that?</p> <p>7 A Yes, I would give some credit, yes, but I 8 would say there was other attributes, too, also.</p> <p>9 Q And in 2020 with Ronnie working through and 10 not, quote, stepping down until October of 2020, 11 there's \$470 million of revenue. Do you give him 12 any credit for that?</p> <p>13 A I would say a lot of people had contributed 14 to that, yes.</p> <p>15 Q Okay. And I'm not saying, nor do we imply 16 by my questions that Ronnie was the only one doing 17 anything. I'm talking about an executive who's a 18 leader and who galvanizes the team and who has 19 connections with utility companies and takes 20 Mowbray's to a doubling of revenue from '18 to '19 21 and '19 to '20.</p> <p>22 Is there not excitement about that?</p> <p>23 A I wouldn't say all that, but it was -- like 24 I said, I wouldn't -- I wouldn't recall that.</p> <p>25 Q And then what happens after he steps down?</p>	<p style="text-align: right;">Page 92</p> <p>1 second, please. I'm not hearing you clearly. If 2 you can slow down and repeat your answer.</p> <p>3 THE WITNESS: If you're saying what happened 4 to 2021, there was a bad accident that happened that 5 really affected us, Mowbray's. There's a lot of 6 things that happened between that time.</p> <p>7 BY MR. CATANZARITE:</p> <p>8 Q But is it fair to say --</p> <p>9 A So we had to pay more money for insurances. 10 There was a lot of different things that happened in 11 this -- in this type of business.</p> <p>12 Q Can you tell me by range or estimate what 13 the revenue was in 2021?</p> <p>14 A No, I couldn't tell you.</p> <p>15 Q Okay. Can you tell by range or estimate 16 what the revenue was in 2022?</p> <p>17 A No, I couldn't tell you -- (unintelligible)</p> <p>18 Q Okay.</p> <p>19 THE REPORTER: I'm sorry. One second. I 20 didn't get the last part of the answer.</p> <p>21 THE WITNESS: I couldn't tell you offhand. 22 No, I couldn't tell you this, no.</p> <p>23 MR. CATANZARITE: Okay.</p> <p>24 BY MR. CATANZARITE:</p> <p>25 Q Well, let me show you. Let me see if it</p>
<p style="text-align: right;">Page 91</p> <p>1 A What do you mean by that?</p> <p>2 Q What happens to that \$470 million revenue 3 achieved at 2020? What happens in 2021?</p> <p>4 A I'm not sure what -- I'm not sure -- like I 5 said, I'm not -- the financials, what are you 6 referring to?</p> <p>7 Q Okay. So we doubled from '18 to '19 \$92 8 million to \$220 million. True so far?</p> <p>9 A Yeah, well, we didn't get a lot of -- we 10 didn't get a lot of area in PG&E. There's a lot of 11 things that contributed to that. We got -- the Bay 12 Area was just the worst.</p> <p>13 There was a lot of -- a lot of things that 14 happened between that time. But like I said, 15 financials, you have to talk to Alan Phaing. He was 16 our accountant. A lot of things that contribute to, 17 you know --</p> <p>18 Q You're not -- 19 (Simultaneously speaking. Not reportable.)</p> <p>20 THE REPORTER: Sorry. One second. You're 21 talking at the same time.</p> <p>22 THE WITNESS: We had a -- we had a very bad 23 accident in Edison where they -- (unintelligible)</p> <p>24 THE REPORTER: I'm sorry. I didn't hear. 25 I'm sorry. Ms. Mowbray, if you can give me a</p>	<p style="text-align: right;">Page 93</p> <p>1 helps you. Do you see -- let me go to 2021. Let's 2 go to 2021. Okay. 2021 revenue was -- do you see 3 it says total sales on this page \$284,079?</p> <p>4 A Yes.</p> <p>5 Q I'm sorry. I miss -- misspoke. I'll 6 rephrase the question. Do you see the total sales 7 were \$284,079,290?</p> <p>8 A Yes.</p> <p>9 Q And that's on page 3238. And on page 323 -- 10 3240, income was \$31 million -- \$31,052,850. Do you 11 see that?</p> <p>12 A Yes, I see that.</p> <p>13 Q Okay. So revenue declined and profits 14 declined; correct?</p> <p>15 A Yes.</p> <p>16 Q And in 2022, you lost money; correct?</p> <p>17 A Yes.</p> <p>18 Q Okay. So -- and are you going to attribute 19 that to happenstance in the business and unfortunate 20 injury?</p> <p>21 A Yes.</p> <p>22 Q In other words, you're not going to 23 attribute it to the change in management.</p> <p>24 A No.</p> <p>25 Q So Ricky who was how old in January of 2021?</p>

<p style="text-align: right;">Page 94</p> <p>1 A I'm not sure. What does that have to do 2 anything? An age? Maybe 35.</p> <p>3 Q Okay.</p> <p>4 A 34.</p> <p>5 Q And so Ricky takes over in the end of 2020, 6 a \$470 million year that Mr. Jordan had led, and 7 immediately, the decline is material; correct?</p> <p>8 A There's a lot of attributes that happened 9 around that time, sir.</p> <p>10 Q And then in 2022, there's a massive loss; 11 correct?</p> <p>12 A Yes.</p> <p>13 Q Okay. And he -- he, Ricky, is not to blame 14 for any of that decline and loss?</p> <p>15 A No blame at all.</p> <p>16 Q Okay. You as a shareholder, you're happy 17 with that result?</p> <p>18 A Well, sir, like I said, this business is 19 very hard. We've had accidents, we've had deaths, 20 and we've had a loss in -- we didn't get a lot of 21 areas. And PG&E, we had the Bay Area. There's a 22 lot of attributes.</p> <p>23 So I'd say, yeah, there's a lot that goes 24 into this business, and it's just not one person 25 that contributes to making it or breaking it.</p>	<p style="text-align: right;">Page 96</p> <p>1 makes relevancy objections or will tell you not 2 to -- not to answer a question. This is a 3 deposition, so I'm entitled to ask you.</p> <p>4 And I'm going to show you Pino Tree Service 5 the -- this is a Secretary of State filing for Pino 6 Tree Service marked as Exhibit 8 filed 9/7/22.</p> <p>7 (Whereupon Exhibit 8 was marked for 8 identification.)</p> <p>9 Q Type of business, tree service. Jacobus De 10 Pino is the chief executive, you are the secretary, 11 and Phaing is the CFO?</p> <p>12 Do you see that?</p> <p>13 A Yes.</p> <p>14 Q And you're the owner; correct?</p> <p>15 A Yeah. They're a very small company. So 16 like I said, I don't see how this is relevant to 17 anything that we're talking about, but -- I guess 18 you have it right there.</p> <p>19 Q Okay. And I'm going to show you Exhibit 9. 20 (Whereupon Exhibit 9 was marked for 21 identification.)</p> <p>22 Q This shows Robin Mowbray as the director -- 23 sole director. Do you see that?</p> <p>24 A I do see that. Like I said, I don't know 25 how this is relevant, but I see that, yes.</p>
<p style="text-align: right;">Page 95</p> <p>1 Q Okay. Are you still in business today?</p> <p>2 A Yes.</p> <p>3 Q Okay. Are you in business through Pino Tree 4 Service?</p> <p>5 A No.</p> <p>6 Q Do you own Pino Tree Service?</p> <p>7 A I don't think that's -- what is that 8 relevant to what this case is? They're a 9 subcontractor of ours.</p> <p>10 Q Okay. But my question's a little bit 11 different. Do you -- does Robin Mowbray own Pino 12 Tree Service?</p> <p>13 A I don't see what that has to do with this at 14 all.</p> <p>15 Q Are you unable to answer the question, 16 Ms. Mowbray?</p> <p>17 A Yes, I am. I don't feel comfortable in 18 answering that question. Yes, I don't feel 19 comfortable.</p> <p>20 Q What makes you uncomfortable about that 21 question?</p> <p>22 A Because I think it's irrelevant.</p> <p>23 Q Other than that --</p> <p>24 A It's irrelevant.</p> <p>25 Q Okay. But you're -- you see, your lawyer</p>	<p style="text-align: right;">Page 97</p> <p>1 Q Well, my question -- my next question to you 2 is, Ms. Mowbray, are -- are you moving the business 3 of MTS into Pino because of adverse financial 4 consequences at MTS?</p> <p>5 A No, sir. No, sir.</p> <p>6 Q Can you tell me why you became the owner and 7 acquired Pino Tree Service?</p> <p>8 A I think it's just our agreement that we have 9 Pino. He was having financial difficulties, and I 10 think you just need to ask him those questions, 11 really.</p> <p>12 Q Okay. How much did you pay Pino for this 13 stock?</p> <p>14 A I'm not sure.</p> <p>15 Q Give me a range or estimate, please.</p> <p>16 A I don't have it. I'm not -- I think it's 17 still in negotiations, so I'm not aware. You'd have 18 to ask our financial or accountant. You can ask 19 Alan.</p> <p>20 Q Okay. So you can't tell me whether you paid 21 a dollar or a million dollars.</p> <p>22 A No, I couldn't.</p> <p>23 Q Okay.</p> <p>24 MR. CHO: It's been about an hour, Ken.</p> <p>25 When you think it's appropriate, I'd like another</p>

<p>1 ten-minute break.</p> <p>2 MR. CATANZARITE: That will be good. Let's</p> <p>3 do -- come back at 11:31.</p> <p>4 MR. CHO: Sounds good.</p> <p>5 MR. CATANZARITE: Thank you.</p> <p>6 THE VIDEOGRAPHER: Going off the record at</p> <p>7 11:22 a.m.</p> <p>8 (Whereupon a short break was taken</p> <p>9 from the proceedings.)</p> <p>10 THE VIDEOGRAPHER: The time is 11:40 a.m.</p> <p>11 We're back on the video record.</p> <p>12 MR. CATANZARITE: So, Robin, you were -- you</p> <p>13 asked me something before we went back on the</p> <p>14 record. Would you state it for the record, please.</p> <p>15 THE WITNESS: Yes, please. I'm so sorry.</p> <p>16 I've been sick this whole weekend, and I just -- I</p> <p>17 feel nauseous. I can't concentrate. I just want to</p> <p>18 be able to give you my best testimony. If we could</p> <p>19 reschedule.</p> <p>20 MR. CATANZARITE: And thank you for that,</p> <p>21 Robin. We hope you get well.</p> <p>22 THE WITNESS: Thank you.</p> <p>23 MR. CATANZARITE: Your lawyer Stephen and I</p> <p>24 discussed at the break that we would trail you after</p> <p>25 Ricky's deposition --</p>	<p>Page 98</p> <p>1 there so that they know where we begin; all right?</p> <p>2 THE WITNESS: Thank you so much. Thank you.</p> <p>3 MR. CATANZARITE: You're welcome. Thank</p> <p>4 you. All right. Thank you, Elizabeth.</p> <p>5 MR. CHO: I just need the transcript. I</p> <p>6 will not need the video.</p> <p>7 THE VIDEOGRAPHER: Thank you. Sorry. This</p> <p>8 concludes the deposition of Robin Mowbray. Going</p> <p>9 off the record at 11:42 a.m.</p> <p>10 (Deposition proceeding concluded at 11:42 a.m.)</p> <p>11 -00-</p>
<p>1 THE WITNESS: Sure.</p> <p>2 MR. CATANZARITE: -- which is set for</p> <p>3 June 7th beginning at 9:00 a.m. We'll do it by</p> <p>4 video again, and you could stand by and go back on 2</p> <p>5 to 3 o'clock.</p> <p>6 THE WITNESS: Sure.</p> <p>7 MR. CATANZARITE: And we'll try to stay</p> <p>8 late. Kieu, will you be doing that depo?</p> <p>9 THE REPORTER: No. I will be out of town,</p> <p>10 actually.</p> <p>11 MR. CATANZARITE: Okay. So we'll ask --</p> <p>12 we'll ask the court reporter if they can give us</p> <p>13 someone who can stay late. We don't want them to</p> <p>14 have to run out at 5:00, if that's okay.</p> <p>15 Stephen, is that okay with you -- I know you</p> <p>16 have young children -- to stay late?</p> <p>17 MR. CHO: Yes.</p> <p>18 MR. CATANZARITE: Will that work for you?</p> <p>19 MR. CHO: It works on that day.</p> <p>20 MR. CATANZARITE: Okay. All right. Okay.</p> <p>21 So with that, we're going to conclude the record as</p> <p>22 it is so far. This will be part one, and we'll</p> <p>23 reconvene part two on the 7th.</p> <p>24 And, Kieu, if you could give the page</p> <p>25 number -- the last page number to your bosses over</p>	<p>Page 99</p> <p>1 REPORTER'S CERTIFICATION</p> <p>2</p> <p>3 I, KIEU PHAM, a Certified Shorthand</p> <p>4 Reporter, in and for the State of California, do</p> <p>5 hereby certify:</p> <p>6 That the foregoing witness was by me duly</p> <p>7 sworn; that the deposition was then taken before me</p> <p>8 at the time and place herein set forth; that the</p> <p>9 testimony and proceedings were reported</p> <p>10 stenographically by me and later transcribed into</p> <p>11 typewriting under my direction; that the foregoing</p> <p>12 is a true record of the testimony and proceedings</p> <p>13 taken at that time.</p> <p>14</p> <p>15</p> <p>16 IN WITNESS WHEREOF, I have subscribed my</p> <p>17 name this 13th day of June, 2023.</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: right;"></p> <p>Kieu Pham, CSR NO. 13667</p> <p>(The foregoing certification of this transcript does not apply to any reproduction of the same by any means, unless under the direct control and/or supervision of the certifying reporter.)</p>

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	Page 102 DECLARATION UNDER PENALTY OF PERJURY Assignment No. 445868 Case Caption: Jordan v. The Original Mowbray's Tree Service, Inc., et al. I declare under penalty of perjury that I have read the entire transcript of my Deposition taken in the above captioned matter or the same has been read to me, and the same is true and accurate, save and except for changes and/or corrections, if any, as indicated by me on the DEPOSITION ERRATA SHEET hereof, with the understanding that I offer these changes as if still under oath. Signed on the _____ day of _____, 20_____. _____ ROBIN MOWBRAY
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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	Page 103 DEPOSITION ERRATA SHEET Page No. _____ Line No. _____ Change to: _____ Reason for change: _____ Page No. _____ Line No. _____ Change to: _____ Reason for change: _____ Page No. _____ Line No. _____ Change to: _____ Reason for change: _____ Page No. _____ Line No. _____ Change to: _____ Reason for change: _____ Page No. _____ Line No. _____ Change to: _____ Reason for change: _____ Page No. _____ Line No. _____ Change to: _____ Reason for change: _____ Page No. _____ Line No. _____ Change to: _____ Reason for change: _____ Page No. _____ Line No. _____ Change to: _____ Reason for change: _____ SIGNATURE: _____ DATE: _____ ROBIN MOWBRAY
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